

Exhibit C

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHABTAI SCOTT SHATSKY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.
)	1:02-CV-02280 (RJL)
THE SYRIAN ARAB REPUBLIC, et al.,)	
)	
Defendants.)	
<hr/>		

VIDEOTAPED DEPOSITION OF
RAED TAHA MAHMUD AMAYRA

JERUSALEM, ISRAEL
SEPTEMBER 10, 2012

REPORTED BY: AMY R. KATZ, RPR

Videotaped deposition of RAED TAHA MAHMUD
AMAYRA, taken in the above-entitled cause pending in
the United States District Court for the District
of Columbia, pursuant to notice, before AMY R. KATZ,
RPR, at the American Colony Hotel, Executive Room,
Jerusalem, Israel, on Monday, the 10th day of September,
2012, at 1:13 p.m.

APPEARANCES:

FOR PLAINTIFFS:

LAW OFFICES OF DAVID I. SCHOEN
By: DAVID I. SCHOEN, ESQ.
2800 Zelda Road
Suite 100-6
Montgomery, Alabama 36106-3700
(334) 395-6611 / Fax (917) 591-7586
dschoen593@aol.com

FOR DEFENDANTS:

MILLER & CHEVALIER CHARTERED
By: RICHARD A. HIBEY, ESQ.
TIMOTHY O'TOOLE, ESQ.
655 Fifteenth Street, NW
Suite 900
Washington, DC 20005-5701
(202) 626-5800 / Fax (202) 626-5801
rhibey@milchev.com
totoole@milchev.com

1 APPEARANCES (Continued):

2 ALSO PRESENT:

3 MITCHELL COOPERSMITH, Videographer

4 SHIMON BEN-NAIM, Official Arabic Interpreter

5 ALBERT AGHAZARIAN, Official Arabic Interpreter

6 GEORGE HAZOU, Check Arabic Interpreter

7 MORDECHAI HALLER, Advocate

8 AVI LEITNER, Advocate

9 OSAMA SAADI, Advocate

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS

Raed Taha Mahmud Amayra

EXAMINATION	PAGE
By Mr. Schoen	10

E X H I B I T S

(None.)

Q U E S T I O N S I N S T R U C T E D
N O T T O A N S W E R

PAGE	LINE
14	11

P R O C E E D I N G S

(The following proceedings were conducted through the Official Arabic Interpreters, unless otherwise indicated.)

THE VIDEOGRAPHER: This is the videotaped deposition of Raed Taha Mahmud Amayra, taken by David Schoen, in the matter of Shatsky versus Syrian Arab Republic, held at the Colony Hotel, Jerusalem, Israel, September 10, 2012.

The court reporter is Amy Katz. The videographer is Mitchell Coopersmith.

Will counsel now state their appearance.

MR. SCHOEN: David Schoen, along with Mordechai Haller and Avi Leitner, for the plaintiffs.

MR. HIBEY: Richard Hibey with --

MR. O'TOOLE: Timothy O'Toole.

MR. HIBEY: -- for the defendants.

THE VIDEOGRAPHER: Will the court reporter now swear in the witness and the translators.

//

//

//

//

1 ALBERT AGHAZARIAN

2 -and-

3 SHIMON BEN-NAIM,

4 the Official Arabic Interpreters, were
5 duly affirmed to translate from English
6 to Arabic and from Arabic to English.

7

8 RAED TAHA MAHMUD AMAYRA,

9 called as a witness, being first duly
10 affirmed, was examined and testified
11 as hereinafter set forth:

12

13:14:51 13 MR. HIBEY: I have a statement before the
13:14:53 14 proceedings.

13:14:53 15 This witness is being offered to respond
13:14:55 16 to subject matter related to Categories 3 and 4 of
13:15:00 17 the Amended Notice of 30(b)(6) depositions of the PA
13:15:07 18 in the area of the PA's organizational law enforcement
13:15:12 19 conduct in matters dealing with the PFLP. This includes
13:15:18 20 security issues under Category 10.

13:15:22 21 Political and financial issues also designated
13:15:26 22 in Categories 3 and 4 of the amended notice will be
13:15:31 23 addressed by other witnesses. Category 10 issues will
13:15:36 24 also be addressed by another witness.

13:15:40 25 Thank you.

13:15:46 1 MR. SCHOEN: I'd like to respond.

13:15:47 2 The notice we were provided by defendants
13:15:49 3 in this case provided that this witness was being
13:15:54 4 designated to testify as to Categories 3 and 4 of
13:16:00 5 the second -- the Plaintiffs' Second Amended notice
13:16:03 6 to the PA of taking depositions, pursuant to Federal
13:16:07 7 Rule of Civil Procedure 30(b)(6), without any limitation
13:16:14 8 regarding law enforcement and/or whatever other
13:16:18 9 limitation Mr. Hibey just mentioned. And we prepared
13:16:22 10 accordingly.

13:16:23 11 We also received no notice that this witness
13:16:26 12 would be designated for Category 10. And I'm not
13:16:30 13 prepared to examine this witness on Category 10.

13:16:34 14 I would further note that there's been a
13:16:36 15 series of e-mails between counsel for the plaintiffs
13:16:39 16 and counsel for the defendants, confirming the subjects
13:16:43 17 for each witness.

13:17:02 18 MR. O'TOOLE: Just to clarify -- just to
13:17:02 19 clarify the record slightly, there are other witnesses
13:17:06 20 who are also designated for Categories 3 and 4 and will
13:17:10 21 be prepared to discuss the organizational and political
13:17:13 22 categories that you just discussed, as well as financial
13:17:16 23 categories.

13:17:17 24 And also with respect to Category 10, this
13:17:19 25 witness -- we were just putting you on notice that this

13:17:23 1 witness may be asked questions about that category, but
13:17:26 2 there are other witnesses who have been designated for
13:17:28 3 Category 10 who will also be prepared to address those
13:17:33 4 issues.

13:17:34 5 MR. SCHOEN: To clarify, when you say he "may
13:17:36 6 be asked questions" about Category 10, do you mean, from
13:17:39 7 your perspective, I'm able to ask the categories?

13:17:42 8 MR. HIBEY: No. We just don't know what
13:17:45 9 questions you're going to ask. And rather than try
13:17:47 10 to parse things too finely -- there'll be enough of
13:17:50 11 that as we go forward -- we just thought this might
13:17:55 12 bring some clarity to what this witness will be able
13:17:59 13 to testify to and that would help -- that would -- I
13:18:05 14 use the word "help" -- I don't mean it in the pejorative
13:18:07 15 sense, but that might facilitate your questioning of
13:18:14 16 him and with the understanding or the realization that
13:18:17 17 others will be testifying in the Categories 3, 4, and
13:18:20 18 10.

13:18:21 19 MR. O'TOOLE: Just to -- just to be clear,
13:18:22 20 it's just to put you on notice that, if you would
13:18:25 21 like to ask questions about Category 10, you may,
13:18:28 22 because this witness can answer some questions about
13:18:31 23 Category 10. We're not representing that he is the
13:18:33 24 entirety of Category 10, because we have other
13:18:37 25 witnesses who will also address that subject matter

13:18:40 1 as we go forward.

13:18:43 2 MR. SCHOEN: Just two final things from my
13:18:43 3 perspective, if I may. One is, it would be helpful
13:18:43 4 in the future, as to any other witnesses, if there is
13:18:46 5 a limitation within the category on which you intend
13:18:50 6 to designate that witness, we would appreciate knowing
13:18:53 7 that in advance so we could prepare accordingly.

13:18:56 8 And two, from our perspective, we believe that
13:18:58 9 the law permits us to inquire beyond the categories for
13:19:02 10 which the defendant is designated in any event. So I
13:19:06 11 appreciate the courtesy implied or even directly stated
13:19:11 12 in your statement about what you would allow us to
13:19:15 13 inquire about.

13:19:16 14 MR. HIBEY: That's what it was meant to be,
13:19:18 15 because there are a number of witnesses remaining in
13:19:21 16 this particular area and we just thought, under the
13:19:27 17 circumstances, that would be something you might like
13:19:32 18 to know.

13:19:32 19 We'll take every question as it comes and
13:19:36 20 object where appropriate, and not, when not appropriate
13:19:40 21 in our minds.

13:19:40 22 MR. SCHOEN: Okay. Thank you.

13:19:41 23 //

13:19:41 24 //

13:19:41 25 //

EXAMINATION

BY MR. SCHOEN:

Q. Sir, could I have your name, please?

A. My name is Raed Taha Mahmud Amayra.

Q. And how old are you?

A. Forty-three years old.

Q. Where do you live?

A. Ramallah.

Q. How long have you lived there?

A. Seventeen years.

Q. Do you live in a house or an apartment?

A. In an apartment there.

Q. And do you own it or you rent it?

A. Rent it.

Q. Who pays the rent for that apartment?

A. The PA.

Q. If I may ask, how shall I call you? Mr. Taha?

Mister --

A. Mr. Raed.

Q. Mr. Raed. And I'm David Schoen. You may call me David, if you like.

Mr. Raed, do you speak English?

A. No.

Q. You feel you need the translator today?

A. Certainly.

13:21:21 1 Q. Have you ever testified before, given
13:21:23 2 testimony like today?

13:21:27 3 A. You mean in an American court?

13:21:29 4 Q. In any sort of court, have you given
13:21:32 5 testimony?

13:21:34 6 A. In Israel.

13:21:36 7 Q. In what kind of case?

13:21:42 8 A. In an operation that happened in Tel Aviv.

13:21:45 9 Q. What kind of operation?

13:21:52 10 A. Suicidal operation.

13:21:53 11 Q. I see. And when was that testimony given,
13:21:56 12 if you remember?

13:22:01 13 A. Maybe more than a year.

13:22:03 14 Q. More than a year ago, from now?

13:22:08 15 A. More than a year.

13:22:10 16 Q. What -- what was that suicide bombing?

13:22:18 17 A. Somebody blew himself up.

13:22:20 18 Q. Where?

13:22:24 19 A. I think the Dolphinarium operation.

13:22:29 20 Q. Do you remember who the suicide bomber was?

13:22:38 21 A. Somebody from Kalkiliya, I believe from the
13:22:43 22 Hotari family.

13:22:47 23 Q. Do you remember what organization or faction
13:22:49 24 that person was associated with?

13:22:52 25 A. Hamas movement.

13:22:57 1 (Court reporter clarification.)

13:22:57 2 Q. BY MR. SCHOEN: Mr. Raed, how far did you

13:23:26 3 go in school?

13:23:33 4 A. MA in law.

13:23:34 5 (Court reporter clarification.)

13:23:34 6 Q. BY MR. SCHOEN: Where did you get your MA

13:23:39 7 in law?

13:23:40 8 A. Al-Quds University.

13:23:43 9 Q. Where is that?

13:23:45 10 A. In Abu Dis.

13:23:49 11 Q. And when did you finish that degree?

13:23:58 12 A. Last semester, about four months ago.

13:24:05 13 Q. Congratulations.

13:24:07 14 A. Thank you.

13:24:08 15 Q. Before that, where did you go to school?

13:24:12 16 A. You mean the BA?

13:24:15 17 Q. Any school that you went to.

13:24:18 18 A. I studied in Hebron school. I took my BA

13:24:25 19 in law in Iraq and continued with my MA at Al-Quds

13:24:31 20 University.

13:24:33 21 Q. Where did you grow up?

13:24:39 22 A. I grew up in Hebron and in Ramallah.

13:24:45 23 Q. Have you lived anyplace else? Besides the

13:24:48 24 time when you were in university in Iraq, have you --

13:24:53 25 have you lived anyplace other than Hebron or Ramallah?

13:25:07 1 A. Certainly not.

13:25:13 2 Q. How are you employed today?

13:25:21 3 A. I am the legal advisor for the Preventive
13:25:26 4 Security organ for the West Bank and supervise
13:25:33 5 interrogation in the West Bank.

13:25:36 6 Q. Who is -- for whom? The PA?

13:25:43 7 A. I am in a security apparatus that -- that
13:25:46 8 comes under the PA.

13:25:48 9 Q. The PA pays your salary?

13:25:53 10 A. For sure.

13:25:55 11 Q. Today I am going to refer to the PA
13:26:01 12 interchangeably with the "PNA," if that's okay.

13:26:15 13 A. Both are acceptable.

13:26:17 14 Q. I mean the same thing when I say one or
13:26:20 15 the other.

13:26:20 16 A. No problem.

13:26:26 17 Q. If there is anything I say that you don't
13:26:28 18 understand through the translator, please tell me,
13:26:32 19 and I'll try to change how I say it.

13:26:39 20 A. If you want my opinion, Shimon gets the
13:26:49 21 idea right. He brings the point.

13:26:51 22 Q. I just meant I may not be clear in my
13:26:55 23 questioning.

13:26:57 24 A. If I feel that there is any misunderstanding,
13:27:01 25 I'll certainly ask.

13:27:03 1 Q. Are you under any medication today or
13:27:06 2 suffering from any illness that's an impediment to
13:27:10 3 your testimony, truthfully and completely?

13:27:22 4 A. Certainly not.

13:27:25 5 Q. What is your understanding of why you're here
13:27:28 6 today as a witness?

13:27:35 7 A. So that I tell the truth.

13:27:39 8 Q. About what subject or subjects?

13:27:43 9 A. The security issues. The role of the PA in
13:27:53 10 chasing after terrorism.

13:27:59 11 Q. And who explained to you what you're here
13:28:03 12 to testify about today?

13:28:08 13 MR. HIBEY: Excuse me. I think that's a
13:28:11 14 privileged question, and I'll instruct the witness
13:28:14 15 not to answer it.

13:28:17 16 MR. SCHOEN: Translate that.

13:28:21 17 OFFICIAL INTERPRETER BEN-NAIM: I didn't hear
13:28:22 18 it.

13:28:22 19 MR. HIBEY: It's privileged. It's a question
13:28:26 20 which indicates privilege, and I'm instructing the
13:28:30 21 witness not to answer it.

13:28:33 22 MR. SCHOEN: To be clear, I'm asking the
13:28:35 23 witness who told him what his -- the subjects would
13:28:36 24 be or -- subject or subjects would be of his testimony,
13:28:38 25 nothing about the content or what he was told by that

13:28:42 1 person.

13:28:43 2 MR. HIBEY: Same instruction.

13:28:55 3 OFFICIAL INTERPRETER BEN-NAIM: Could you
13:28:55 4 please repeat the question?

13:28:57 5 MR. HIBEY: No, I said "same instruction."

13:28:59 6 Do not answer the question.

13:29:01 7 OFFICIAL INTERPRETER BEN-NAIM: Yes, but just
13:29:01 8 for me to translate. I told him already not to answer.

13:29:09 9 MR. HIBEY: Tell him again.

13:29:10 10 MR. SCHOEN: Mine wasn't really a question.
13:29:12 11 I said, to be clear, I am asking the witness simply
13:29:18 12 who told him. I'm paraphrasing. I may not be saying
13:29:24 13 exactly what I said, but this is what I meant.

13:29:26 14 MR. HIBEY: Yes, but you used the word "ask."
13:29:28 15 And I have instructed the witness not to answer.

13:29:31 16 MR. SCHOEN: My understanding is the
13:29:35 17 translator just wanted me to repeat it because he
13:29:38 18 hadn't translated what I said.

13:29:49 19 I just wanted to make the point that I was
13:29:52 20 asking the witness who told him the subjects he would
13:30:01 21 be asked to testify about today. I'm not inquiring to
13:30:09 22 the extent that person was a lawyer -- his lawyer, that
13:30:19 23 is, to the extent that person was his lawyer -- what it
13:30:23 24 is his lawyer said to him or he said to his lawyer.

13:30:34 25 MR. HIBEY: And I continue with the

13:30:37 1 instruction to the witness not to answer the question.

13:30:45 2 Q. BY MR. SCHOEN: Who is your lawyer for
13:30:49 3 purposes of these proceedings?

13:30:54 4 A. Mister (indicating).

13:30:58 5 Q. Mr. Hibey, across from me?

13:31:02 6 A. Yes.

13:31:03 7 Q. And Mr. O'Toole, next to Mr. Hibey?

13:31:10 8 A. Yes. Correct.

13:31:11 9 Q. And how about -- how about Mr. Saadi, is
13:31:13 10 he your lawyer also?

13:31:18 11 A. I know that they are a team.

13:31:29 12 Q. Do you consider Mr. Saadi, who is sitting
13:31:33 13 next to Mr. O'Toole, to be your lawyer?

13:31:39 14 A. I believe he is part of the team.

13:31:47 15 MR. SCHOEN: To try to shortcut things, I
13:31:50 16 would like to ask the witness what he spoke to you,
13:31:55 17 Mr. Hibey, and Mr. O'Toole about, and Mr. Saadi. So
13:32:02 18 rather than just asking him those questions, I wanted
13:32:05 19 to -- we could shortcut it, if you would have the same
13:32:09 20 objection and, I assume, the same instruction.

13:32:10 21 MR. HIBEY: It would be the same objection
13:32:12 22 and same instruction. Yes.

13:32:24 23 MR. SCHOEN: I'd like to ask the witness --
13:32:26 24 I'll ask the witness whether he spoke to any non-lawyer,
13:32:30 25 specifically --

13:32:44 1 MR. HIBEY: I'm going to instruct the witness
13:32:46 2 not to answer any questions about the circumstances
13:32:49 3 associated with his becoming a witness on behalf of
13:32:54 4 the defendants in this 30(b)(6) proceeding.

13:33:06 5 (Court reporter clarification.)

13:33:25 6 MR. SCHOEN: To be clear and avoid any
13:33:27 7 misunderstanding, I believe that I'm entitled to ask
13:33:31 8 the witness about the steps he took to prepare for his
13:33:39 9 testimony today and the circumstances under which he
13:33:48 10 became a designee for the defendants for the testimony
13:33:53 11 today.

13:34:13 12 I'm asking this question not to be rude,
13:34:15 13 only to see whether -- if the defense wants to raise
13:34:20 14 an objection, raise it. I just want to ask the
13:34:21 15 question.

13:34:27 16 Q. BY MR. SCHOEN: Mr. Raed, what, if any, steps
13:34:31 17 did you take to prepare to testify today?

13:34:43 18 A. I am a security man, and I work in security
13:34:49 19 since around 17 years. And the nature of my work is
13:34:56 20 to combat terrorism and to chase armed gangs. As such,
13:35:12 21 I have the capacity to respond to any question related
13:35:16 22 to this matter.

13:35:19 23 As a security officer since 17 years, I have
13:35:25 24 acquired the experience, and I have sufficient memory
13:35:37 25 to record the operations that occurred after 2000 and

2001, 2002. And concerning this particular case, I am part of the team that have been engaged in the investigation.

While we were in the Preventive Security, this was at the core of our specialization. And for sure, I have consulted with some of my colleagues who were involved at the time, and I asked them about certain issues that I might not have remembered because, at the end of the day, I must speak the truth and our role during that particular phase.

Q. With whom did you consult?

A. For instance, Iyad Al-Aqra'a, who was the head of the PS in Kalkiliya at the time, Preventive Security.

Q. At what time?

A. After 2000, 2001, 2002. After 2000.

Q. I believe you testified you're prepared to testify about security matters after the year 2000?

(Pending question partially translated.)

OFFICIAL INTERPRETER BEN-NAIM: "After"?

MR. SCHOEN: "2000."

(Remainder of pending question translated.)

THE WITNESS: I worked in this field.

Q. BY MR. SCHOEN: How about between 1994 and 2000?

A. Events that happened between '94 and 2000?

13:37:58 1 There were the affairs of the tunnel. In general, the
13:38:05 2 PA was powerful, in control, between '94 and 2000. The
13:38:12 3 operations were very rare.

13:38:19 4 CHECK INTERPRETER HAZOU: "Or nonexistent."

13:38:21 5 OFFICIAL INTERPRETER AGHAZARIAN: "Or
13:38:21 6 nonexistent."

13:38:22 7 THE WITNESS: But mostly I remember the events
13:38:28 8 that erupted with the tunnel.

13:38:31 9 Q. BY MR. SCHOEN: When you say you worked in
13:38:32 10 security during these years, from 2000 forward --

13:38:44 11 A. No, not from 2000 and onwards. From '95
13:38:50 12 onwards. 1995 onwards.

13:38:52 13 Q. Thank you.

13:38:53 14 So from -- when you say you worked in security
13:38:55 15 from 1995 forward --

13:39:03 16 A. Until now.

13:39:04 17 Q. Yes. Starting in 1995, what jobs in security
13:39:09 18 did you hold?

13:39:10 19 A. I started to work in interrogation. And
13:39:28 20 then I became the head of the investigations in
13:39:33 21 the Hebron area. Then I became legal advisor for
13:39:45 22 interrogation in Jericho, when the PA was centered
13:39:50 23 in Jericho.

13:39:58 24 Then I moved to be a legal advisor and
13:40:01 25 supervising interrogation for the West Bank. And,

13:40:05 1 currently, I am the legal advisor and supervising
13:40:09 2 interrogation for the entire West Bank.

13:40:11 3 Q. At all times from 1995 until today, were
13:40:23 4 you employed by the PA?

13:40:27 5 A. A hundred percent.

13:40:30 6 Q. Do you recall, since 1995, who your
13:40:39 7 supervisors were?

13:40:44 8 A. Used to be Jibril Rajoub.

13:40:45 9 Q. From what period until what period, if he
13:40:51 10 remembers?

13:40:59 11 A. He proceeded since I have joined the apparatus
13:41:03 12 until 2000, 2002.

13:41:06 13 Q. Jibril was his supervisor?

13:41:10 14 A. Yes.

13:41:10 15 Q. And then since 2002?

13:41:17 16 A. Somebody called Zuheir Manasra came. Now we
13:41:24 17 have Ziad Hab Al-Rih.

13:41:24 18 Q. Excuse me. In the years 1999 to 2002, for
13:41:36 19 example, what was the name of the agency that you worked
13:41:45 20 under, specifically?

13:42:00 21 A. It has the same name, the Preventive Security
13:42:05 22 organ.

13:42:05 23 Q. All right.

13:42:10 24 MR. HALLER: "Organ" or "apparatus"?

13:42:14 25 CHECK INTERPRETER HAZOU: You can say

13:42:15 1 "apparatus." You can say "organ." You can say --
13:42:15 2 MR. HALLER: "Jihaz"?

13:42:17 3 CHECK INTERPRETER HAZOU: "Jihaz" is
13:42:17 4 "apparatus." But, you know, you can say even -- we
13:42:18 5 refer to it sometimes as PSS, Palestinian Security --

13:42:23 6 OFFICIAL INTERPRETER AGHAZARIAN: "Service."

13:42:24 7 CHECK INTERPRETER HAZOU: PPS -- Preventative
13:42:25 8 Security Service. Sorry. "PSS."

13:42:27 9 MR. SCHOEN: I like that. So I can use the
13:42:30 10 term "PSS"?

13:42:32 11 OFFICIAL INTERPRETER BEN-NAIM: If I may just
13:42:33 12 say something. I translated "jihaz" -- you call it in
13:42:38 13 the States "agency."

13:42:40 14 CHECK INTERPRETER HAZOU: Exactly.

13:42:40 15 OFFICIAL INTERPRETER BEN-NAIM: We have a
13:42:41 16 different name. So I translated it into a thing he
13:42:44 17 can understand.

13:42:44 18 (Court reporter clarification.)

13:42:55 19 Q. BY MR. SCHOEN: At all times since 1995
13:42:59 20 until today, you were working with the PSS, Preventive
13:43:04 21 Security Services?

13:43:16 22 A. A hundred percent.

13:43:19 23 Q. I believe your testimony earlier was that the
13:43:25 24 main focus of your job was to combat or chase, something
13:43:34 25 like that, terrorism.

13:43:42 1 A. A hundred percent.

13:43:44 2 Q. Would you please tell us what you mean by
13:43:47 3 "terrorism"?

13:43:54 4 A. As a PA, when we were established, we were
13:44:01 5 committed to the peace process and stuck to it with
13:44:07 6 Israel. And we believed in this process, and we
13:44:19 7 combated and chased every person that was against
13:44:23 8 the peace process.

13:44:28 9 Hamas was against the peace process, and it
13:44:34 10 tried to undermine the peace process. And in our role,
13:44:43 11 we have combated and confronted this movement from the
13:44:48 12 moment that the PA was established and until now. And
13:44:54 13 this is the basis of our function within the PSS, and
13:45:02 14 to chase and punish whoever has not complied with the
13:45:07 15 law and the peace process and the commitments of the
13:45:15 16 PA with the Israeli side.

13:45:18 17 Q. Are you familiar with the PFLP?

13:45:25 18 A. For sure.

13:45:27 19 Q. Is the PFLP an organization you consider to
13:45:31 20 be engaged in terrorism?

13:45:46 21 A. Me, as security, I consider every party
13:45:49 22 that is carrying weapons illegally, I consider them
13:46:02 23 out of the law. In a certain given period, the PFLP
13:46:12 24 was conducting operations, and we have combated and
13:46:16 25 stood up against it. And we detained a number of them.

13:46:23 1 And I remember in this, the case of Ze'evi,
13:46:29 2 we detained the people involved in this operation.
13:46:33 3 I'm speaking as PA, not as security here. As the PA,
13:46:42 4 we have detained them and gave them -- and they were
13:46:46 5 tried.

13:46:47 6 MR. HIBEY: They were what?

13:46:48 7 CHECK INTERPRETER HAZOU: "Tried."

13:46:49 8 THE WITNESS: And we have a law that prohibits
13:46:57 9 having any armed groups, regardless of their political
13:47:00 10 affiliation. And we, as security within the PA,
13:47:12 11 combated all armed groups, from PFLP, from Hamas and
13:47:18 12 Fatah, regardless. And my job was to interrogate with
13:47:26 13 these people and bring them to trial, including PFLP.

13:47:36 14 Q. BY MR. SCHOEN: Who in the PFLP did the PA
13:47:41 15 detain?

13:47:51 16 A. Names?

13:47:53 17 Q. Yes, please.

13:47:54 18 A. In which operation and which case?

13:47:56 19 Q. Any time and all times that you can remember,
13:47:58 20 who in the PFLP?

13:48:03 21 A. I didn't bring the list of the people from my
13:48:07 22 center.

13:48:09 23 Q. As you sit here today, who do you recall among
13:48:13 24 the PFLP that the PA detained at any time?

13:48:29 25 A. Other than Sa'adat and the known people?

13:48:37 1 Other?

13:48:38 2 Q. I'm not sure who he means by "the known
13:48:40 3 people." I heard Sa'adat. But yes, besides Sa'adat,
13:48:44 4 everyone else.

13:48:46 5 A. I remember I interrogated with members of the
13:48:51 6 PFLP, but I don't recall their names. I interrogated
13:48:58 7 with thousands of people during this given period, from
13:49:02 8 all factions. I don't recall.

13:49:11 9 I remember one, he is my friend and my
13:49:16 10 neighbor. This is how I remember his name. His name
13:49:25 11 is Saqr Abu Ras. Although he is my neighbor in Hebron,
13:49:32 12 but I have interrogated with him. I believe this was
13:49:37 13 in '97, '98. And so far he does not talk with me until
13:49:45 14 now.

13:49:45 15 Q. You used --

13:49:47 16 A. I remember some others, but not clearly.

13:49:51 17 Q. You used the word "factions."

13:49:56 18 The PFLP is one of the factions of the PLO?

13:50:06 19 A. For sure.

13:50:07 20 Q. And Fatah?

13:50:09 21 A. Correct.

13:50:10 22 Q. What are some other factions of the PLO?

13:50:17 23 A. Fatah, PFLP, Democratic Front, the Arab
13:50:21 24 Liberation Front, FIDA. There is ample factions within
13:50:30 25 the Palestinian field.

13:50:38 1 Q. And you testified that you enforce the law
13:50:42 2 against all of these factions?

13:50:48 3 A. Correct.

13:50:50 4 Q. Fatah is one faction that has engaged in
13:50:53 5 terrorism?

13:50:58 6 A. As an organization, no. As individuals, it
13:51:03 7 is possible.

13:51:05 8 Q. Individual members of Fatah?

13:51:10 9 A. Possible.

13:51:12 10 Q. You're not aware whether any individual
13:51:15 11 members of Fatah have engaged in terrorism for sure?

13:51:19 12 A. I don't know.

13:51:19 13 OFFICIAL INTERPRETER BEN-NAIM: "I don't
13:51:31 14 know."

13:51:32 15 THE WITNESS: For instance, I know that
13:51:37 16 Marwan is in prison. But whether he was involved in
13:51:42 17 any terrorist action, I don't know. It's not me who
13:51:46 18 interrogated with him.

13:51:48 19 Q. BY MR. SCHOEN: Is that Marwan Barghouti?

13:51:49 20 A. Yes.

13:51:53 21 Q. Any other member of Fatah you believe has been
13:51:59 22 involved with terrorism?

13:52:08 23 A. I don't remember names.

13:52:10 24 Q. And again, if I could get your definition of
13:52:16 25 "terrorism" as you're using it here today?

13:52:28 1 MR. HIBEY: Excuse me. I need to pose an
13:52:30 2 objection, because the use of the word "terrorism" in
13:52:34 3 that question is different than the way it was used
13:52:37 4 earlier and different than the way in which the witness
13:52:40 5 has been responding.

13:52:53 6 THE WITNESS: I am not speaking about the
13:52:55 7 definition of "terrorism" here. I am speaking that any
13:52:59 8 person who was using arms and who was against the peace
13:53:03 9 process, we used to chase after them. I consider them
13:53:07 10 outlaw. And my role as security, it is to chase them.

13:53:14 11 Q. BY MR. SCHOEN: The word that was translated
13:53:16 12 to me was "terrorism."

13:53:18 13 And my question was simply: As you were using
13:53:28 14 that word "terrorism," what do you mean by it?

13:53:43 15 A. In my opinion, any person involved in
13:53:46 16 murdering civilians is a terrorist.

13:53:55 17 Q. When you say "civilians," you would include
13:54:01 18 in that anyone not in the military at the time?

13:54:19 19 A. All who was not military during that period,
13:54:26 20 in the sense that the military is somebody when he is
13:54:30 21 engaged in war. But anyone outside this battle is not
13:54:39 22 military.

13:54:40 23 Q. So it's a civilian, the word you translated
13:54:44 24 as "civilian."

13:54:45 25 OFFICIAL INTERPRETER BEN-NAIM: Yes.

13:54:46 1 THE WITNESS: Civilian. Civilian.

13:54:51 2 Q. BY MR. SCHOEN: Back to the PFLP, I wanted
13:54:57 3 to ask you specifically if you recall anyone who is
13:55:02 4 a PFLP member who was detained, not just interrogated
13:55:11 5 but detained, by the PA?

13:55:21 6 A. There were people -- members who were
13:55:24 7 detained. I don't recall their names.

13:55:31 8 Q. Do you know who -- oh.

13:55:34 9 Do you know who would recall their names,
13:55:37 10 if anybody?

13:55:46 11 A. I may go back to my lists and remember their
13:55:51 12 names.

13:55:51 13 Q. You have a list of people who have been
13:55:56 14 detained or --

13:55:57 15 A. For sure.

13:55:59 16 Q. And would that list be organization or
13:56:02 17 factions that that person belonged to?

13:56:20 18 A. It -- it has all the names of the people that
13:56:25 19 have broken the law and/or committed crimes.

13:56:30 20 Q. Since, let's say, 1995?

13:56:37 21 A. Many of our headquarters have been demolished.
13:56:50 22 Most of our documents and headquarters have been
13:56:56 23 demolished by the Israeli army. But for the sake
13:57:02 24 of the truth, we may research.

13:57:08 25 Q. As you sit here today, what is your belief

13:57:12 1 about what kinds of lists of this nature exist today?

13:57:19 2 (Pending question partially translated.)

13:57:23 3 OFFICIAL INTERPRETER BEN-NAIM: "Lists"?

13:57:25 4 MR. SCHOEN: "Of this nature."

13:57:26 5 (Remainder of pending question translated.)

13:57:26 6 THE WITNESS: From the lists?

13:57:40 7 (Brief exchange in Arabic between Official

13:57:40 8 Interpreter Aghazarian and Check Interpreter

13:57:40 9 Hazou.)

13:57:41 10 THE WITNESS: What are the kinds of lists

13:57:47 11 that we have? According to memory, we might have files,

13:57:50 12 charge sheets, maybe lists just with names of people.

13:57:54 13 It's possible.

13:57:55 14 Q. BY MR. SCHOEN: From any particular time
13:57:57 15 period forward?

13:58:07 16 A. It could be from the beginning of the PA.

13:58:11 17 Q. Which is about 1994?

13:58:14 18 A. Possible.

13:58:15 19 Q. I'm asking: When did the PA begin?

13:58:24 20 A. I started in '94 myself.

13:58:27 21 Q. Do you recall when the PA was created?

13:58:36 22 A. I remember as security organs, we started in
13:58:43 23 '94.

13:58:46 24 Q. Mr. Raed, I ask you this with all respect,
13:58:52 25 but I have to ask you this.

13:58:56 1 A. And I am open to respond to everything I can.

13:59:03 2 Q. Have you ever been arrested?

13:59:05 3 A. For sure.

13:59:07 4 Q. By whom?

13:59:10 5 A. From the Israeli army.

13:59:12 6 Q. When were you arrested?

13:59:16 7 A. I was detained in 1984. I was 14 years old

13:59:24 8 then. At the time, I was working in a restaurant within

13:59:31 9 Israel, Papa Michelle is the name of the restaurant.

13:59:39 10 When I was going home, coming out from the restaurant,

13:59:44 11 I was detained.

13:59:53 12 I was also detained again between '87-'88.

13:59:59 13 And in '89 I was detained.

14:00:12 14 I remember I met the late Rabin in the

14:00:19 15 Dahriya prison in '89, and he told me a word I could

14:00:24 16 never forget. I was in a room where there were 25

14:00:29 17 inmates, and he visited this room. And I used to

14:00:35 18 have perfect Hebrew at the time. So he asked for me

14:00:40 19 to translate for him.

14:00:45 20 He asked the first person inmate: Why are you

14:00:48 21 here?

14:00:50 22 He said: I don't know.

14:00:52 23 He asked all of the others, and everyone said:

14:00:59 24 I don't know why I'm here.

14:01:01 25 He asked me: Why are you here?

14:01:06 1 Because I work in a restaurant in Beer Sheva.
14:01:12 2 I said: From '84, I have been frequenting to work in
14:01:22 3 this particular restaurant.

14:01:28 4 And David Ben David, the owner of the place,
14:01:34 5 is still my friend until now. And he is a religious
14:01:40 6 person. We still exchange telephone calls, and he is
14:01:43 7 my friend. And I hope that we will remain friends. I
14:01:50 8 told him that I live most all of my time within Israel.
14:01:56 9 I go only over the weekend, Fridays and Saturdays, so
14:02:02 10 it's not possible that I would put stones in Beer Sheva.

14:02:09 11 He told me a word that I will never forget:
14:02:11 12 When there is war between two countries, not all the
14:02:21 13 dead are participants in the war. There are also
14:02:28 14 victims that fall in between.

14:02:32 15 Q. How long were you detained in 1984?

14:02:36 16 A. Three months.

14:02:39 17 Q. Was there a charge brought against you, that
14:02:43 18 you're aware of?

14:02:45 19 A. '84, there wasn't much happening. There were
14:02:59 20 certain marches and certain demonstrations. Maybe I
14:03:04 21 was still a minor.

14:03:06 22 Q. I just mean: Do you know whether you were
14:03:09 23 charged with something, specifically you?

14:03:20 24 A. Three months means that there was a trial.

14:03:25 25 Q. A trial? And what happened from the trial?

14:03:31 1 (Brief exchange in Arabic between Official
14:03:31 2 Interpreter Aghazarian and Check Interpreter
14:03:31 3 Hazou.)
14:03:42 4 THE WITNESS: Participating in demonstrating,
14:03:47 5 marches.
14:03:47 6 Q. BY MR. SCHOEN: And were you found guilty?
14:03:49 7 Not guilty?
14:03:50 8 A. If it's three months, it means I was
14:03:53 9 convicted.
14:03:54 10 Q. Did you have a lawyer, if you remember?
14:04:02 11 A. Possible, certainly.
14:04:04 12 Q. You don't remember who the lawyer was, if you
14:04:05 13 had one?
14:04:13 14 A. There were other lawyers. I mean, my
14:04:17 15 parents -- there were lawyers. My parents -- I don't
14:04:20 16 recall his name. There was a lawyer.
14:04:23 17 Q. Your parents are lawyers also?
14:04:26 18 A. No, no.
14:04:27 19 Q. Oh, I see.
14:04:30 20 A. It's better that they are not.
14:04:36 21 Q. One black sheep in the family is enough.
14:04:42 22 A. My wife is a lawyer.
14:04:44 23 Q. I wouldn't call your wife any name.
14:04:52 24 A. She is a judge, actually.
14:04:54 25 Q. Then I especially wouldn't call her any name.

14:05:00 1 In '87-'88, how long were you detained?

14:05:13 2 A. Eighteen days. Then administrative, four

14:05:19 3 months in the Negev.

14:05:25 4 Q. For what?

14:05:28 5 A. There were no charges.

14:05:30 6 CHECK INTERPRETER HAZOU: But you said "four

14:05:32 7 months"; right?

14:05:34 8 OFFICIAL INTERPRETER AGHAZARIAN: "Four

14:05:34 9 months."

14:05:36 10 MR. SCHOEN: I wasn't asking "four what."

14:05:37 11 It wasn't a good question. I meant: Why was he

14:05:40 12 detained? Sorry.

14:05:42 13 THE WITNESS: There was no charge.

14:05:43 14 Q. BY MR. SCHOEN: Thank you.

14:05:45 15 And, in 1989, how long were you detained?

14:05:59 16 A. It's the same period. One is 18 days. And,

14:06:04 17 in '89, it's four months.

14:06:10 18 Q. So three times you were detained?

14:06:12 19 A. Yes.

14:06:13 20 Q. And for the four months, there was no charge

14:06:16 21 brought?

14:06:17 22 A. This is administrative. Administrative.

14:06:20 23 Q. Was any reason given for the administrative

14:06:25 24 detention?

14:06:31 25 A. No one asked me anything. They took me from

14:06:34 1 home, and they put me in the lock-up, Negev.

14:06:40 2 Q. And the '87-'88, the 18 days, what charge was
14:06:47 3 brought?

14:06:55 4 A. It was in Dahriya. They rounded up a number
14:06:59 5 of youth and put us into detention.

14:07:03 6 Q. These organizations that have members who
14:07:06 7 engage in terrorism, like Fatah --

14:07:18 8 A. If it engages.

14:07:20 9 Q. "If," yes.

14:07:22 10 MR. HIBEY: I'm sorry. I didn't hear that
14:07:24 11 last translation.

14:07:27 12 OFFICIAL INTERPRETER AGHAZARIAN: "If it
14:07:29 13 engages."

14:07:30 14 Q. BY MR. SCHOEN: The PFLP, for example.

14:07:34 15 A. Any person.

14:07:35 16 Q. You're aware that there are members of the
14:07:39 17 PFLP that engage in terrorism, that have engaged in
14:07:44 18 terrorism; correct?

14:07:48 19 A. How? On what topic?

14:07:53 20 (Brief exchange in Arabic between Official
14:07:54 21 Interpreter Aghazarian and Check Interpreter
14:07:54 22 Hazou.)

14:07:58 23 THE WITNESS: Do you know that there are
14:07:59 24 members of the PFLP that engage in terror activities?

14:08:04 25 Q. BY MR. SCHOEN: That was my question.

14:08:06 1 A. I recall the case of Minister Ze'evi. We
14:08:15 2 interrogated on the case of Wadi Al-Qilt. It turned
14:08:21 3 out they were not the ones who have conducted it.

14:08:27 4 And there was a case in Kalkiliya where
14:08:33 5 they adopted a certain operation where there was an
14:08:41 6 explosion. They took responsibility, and it turned
14:08:49 7 out later that somebody from Hamas perpetrated that
14:08:56 8 operation.

14:09:03 9 I believe that I interrogated in a certain
14:09:07 10 operation that had happened in Ashkelon, and it turned
14:09:12 11 out that they have nothing to do with it.

14:09:15 12 Q. Are you familiar with a bombing, suicide
14:09:18 13 bombing in Karnei Shomron, in February of -- oh, I'm
14:09:23 14 sorry.

14:09:25 15 A. I heard.

14:09:31 16 Q. In February of 2002?

14:09:39 17 A. I was working at the time in security. And
14:09:42 18 for sure, I have heard about it.

14:09:45 19 Q. Are you aware that that was a PFLP operation?

14:09:57 20 A. We heard a communique was issued by PFLP
14:10:02 21 claiming responsibility.

14:10:04 22 Q. Do you have any reason to believe that that
14:10:05 23 was not a PFLP operation?

14:10:15 24 A. More clear?

14:10:16 25 OFFICIAL INTERPRETER BEN-NAIM: "Clearer,

14:10:17 1 please."

14:10:17 2 Q. BY MR. SCHOEN: Do you have -- I'm just going
14:10:19 3 to ask one more question because the time is running
14:10:22 4 out.

14:10:22 5 Do you have any reason to believe that
14:10:29 6 the suicide bombing in Karnei Shomron on or about
14:10:41 7 February 16, 2002, was not a PFLP operation?

14:10:55 8 A. I believe, but maybe they are not the ones.
14:10:59 9 They -- they often claimed responsibility for certain
14:11:03 10 operations that actually was not theirs.

14:11:06 11 Q. So it's your testimony today that you don't
14:11:09 12 know that the bombing that this case is about was a
14:11:22 13 PFLP operation or not?

14:11:32 14 A. If it was conducted by a person and then the
14:11:36 15 PFLP came forward to claim responsibility for conducting
14:11:43 16 this operation and we, as security people, started to
14:11:49 17 interrogate on this matter, it could be PFLP or others
14:11:56 18 that have perpetrated this operation, particularly
14:12:01 19 that the person that claimed to carry this operation
14:12:05 20 was unknown to us and that he belongs to the PFLP.

14:12:14 21 Q. Do you know whether the suicide bomber in
14:12:16 22 this case was a member of the PFLP?

14:12:27 23 A. Before the operation, no.

14:12:30 24 Q. He died in the operation, didn't he?

14:12:35 25 A. He died for sure.

14:12:38 1 Q. And do you know, as you sit here today, what
14:12:42 2 that person's name was?

14:12:45 3 A. Sadiq Abdel Hafith.

14:12:50 4 Q. And do you know now that that man was a member
14:12:53 5 of the PFLP?

14:12:59 6 A. The PFLP claimed responsibility for this
14:13:02 7 operation, and openly, in front of everybody. It was
14:13:10 8 not, for instance, a member of Fatah.

14:13:13 9 MR. SCHOEN: I think we should take a break
14:13:17 10 now because I've overstayed the five minutes we had
14:13:21 11 left.

14:13:23 12 THE VIDEOGRAPHER: Going off the record at
14:13:24 13 2:14.

14:13:28 14 (Recess from 2:14 p.m. to 2:27 p.m.)

14:25:56 15 THE VIDEOGRAPHER: Going back on the record
14:25:58 16 at 2:27.

14:26:03 17 Q. BY MR. SCHOEN: Mr. Raed, I want to ask you
14:26:08 18 some questions about investigative procedures.

14:26:17 19 If there was a -- you understand?

14:26:23 20 A. Legal procedures, you mean?

14:26:25 21 Q. Investigative procedures, law enforcement,
14:26:29 22 investigative procedures.

14:26:30 23 A. (In English.) Okay.

14:26:33 24 Q. And if there is a difference between those
14:26:35 25 procedures in, let's say, 2002 and now, please tell me

14:26:54 1 if there is some difference.

14:27:02 2 I'm focusing now on investigation in around
14:27:06 3 the years 2002 with my questions now.

14:27:15 4 A. I could speak elaborately on this topic.

14:27:31 5 Q. About the procedure in investigating a suicide
14:27:39 6 bombing?

14:27:39 7 A. In our work in security as a whole.

14:27:43 8 Q. I'm really interested in focusing on the
14:27:47 9 procedures for the investigation of a suicide bombing.

14:27:53 10 A. We, as PSS, our main role is political
14:28:02 11 security, in the sense that all of our work is related
14:28:17 12 to operations and political factions and to comply with
14:28:24 13 the peace process and Oslo Accords and implementing
14:28:29 14 Palestinian laws that does not contradict the Oslo
14:28:38 15 Accords.

14:28:41 16 When the PA and its security organs assumed
14:28:46 17 their role, the Preventive Security, while one of
14:28:52 18 this apparatus, most people working in the Preventive
14:28:56 19 Security, most of them or all were previously detainees
14:29:08 20 in the Israeli side. And the PA started to place
14:29:18 21 these people in the security agencies and tried to
14:29:29 22 rehabilitate them and train them and absorb them.

14:29:33 23 As a nascent authority, our procedures were
14:29:37 24 not proper from a legal point of view. They were not
14:29:41 25 accurate. There were lots of complaints filed against

14:29:45 1 us, having to do with human rights, especially using
14:29:54 2 torture against the detainees or to have improper legal
14:30:00 3 steps. Our main objective at the time was -- and the
14:30:11 4 instructions given to us from the political level --
14:30:13 5 to safeguard the peace initiative and to combat anybody
14:30:24 6 who is opposing this initiative.

14:30:31 7 We had headquarters and branches which were
14:30:36 8 not well equipped. Maybe it was difficult sometimes
14:30:42 9 for the detainees. And we utilized what was -- what
14:30:52 10 was the space which was used by the Israeli army
14:30:59 11 previously, especially the interrogation rooms and
14:31:03 12 the cells.

14:31:13 13 At the time, President Arafat ordered for
14:31:18 14 the establishment of the state security tribunals.
14:31:29 15 Its role was to bring to trial anybody who was
14:31:35 16 opposed to the peace process or acting against the
14:31:41 17 Oslo agreement, particularly Hamas, Jihad, and other
14:31:54 18 dissident groups.

14:31:56 19 The state security course did not provide for
14:32:00 20 the proper legal safeguards. Its rulings and procedures
14:32:11 21 were tough, and we were strongly criticized by the human
14:32:23 22 rights organizations that we are undermining proper
14:32:30 23 procedures. Until -- I don't remember exactly the date.
14:32:39 24 But it was 2004, and the state security courts -- courts
14:32:48 25 were dismissed, annulled. The normal courts started to

14:33:00 1 have the mandate in order to look into these issues.

14:33:05 2 During the current period, our professional
14:33:09 3 status is much better, that we have accumulated
14:33:14 4 experience over the last years and we were properly
14:33:20 5 trained. We became qualified as security officers.

14:33:28 6 In addition, that the courts, the laws, are
14:33:32 7 much better than it used to be in the past, especially
14:33:40 8 when the PA assumed -- it said there were no established
14:33:47 9 regulations, we were applying the Jordanian laws, and
14:33:54 10 the Israeli military orders that were implemented in the
14:33:59 11 West Bank. Currently, we have laws, and the institution
14:34:07 12 is in a much better shape than previously.

14:34:11 13 Q. Is there -- we spoke about the PSS.

14:34:17 14 Is there another law enforcement agency within
14:34:26 15 the PA?

14:34:28 16 A. The PA is formed from more than one apparatus.
14:34:38 17 It's the police and the intelligence, the Preventive
14:34:44 18 Security and national security. We and the intelligence
14:34:53 19 work almost in the same realm.

14:34:56 20 Q. So we could say the PSS and intelligence work
14:35:01 21 together in the same realm?

14:35:13 22 A. More or less.

14:35:14 23 Q. And then there is a PA -- sorry -- PA police
14:35:17 24 department that's different from those, your agency and
14:35:21 25 the intelligence agency?

14:35:32 1 A. Yes.

14:35:33 2 Q. What's the name of the police department?

14:35:40 3 A. The police.

14:35:45 4 Q. And national security, that's another agency?

14:35:52 5 A. It's a military apparatus.

14:35:57 6 Q. Now, you described before this effort by the

14:36:01 7 PA at hiring former detainees --

14:36:07 8 (Pending question partially translated.)

14:36:07 9 OFFICIAL INTERPRETER BEN-NAIM: "At"?

14:36:12 10 MR. SCHOEN: "At hiring former detainees."

14:36:12 11 (Brief exchange in Arabic among Official

14:36:30 12 Interpreter Aghazarian, Official Interpreter

14:36:30 13 Ben-Naim, Check Interpreter Hazou, and the

14:36:30 14 witness.)

14:36:31 15 (Remainder of pending question translated.)

14:36:32 16 Q. BY MR. SCHOEN: And hiring them in law

14:36:34 17 enforcement with the effort at rehabilitating them?

14:36:43 18 A. Yes. Correct.

14:36:44 19 Q. Is that in all of the -- did they have that

14:36:48 20 practice in all of those agencies, the police, the --

14:37:03 21 A. It was implemented in the different organs,

14:37:07 22 but specifically within the PSS.

14:37:11 23 Q. And how about the police, they also did that?

14:37:20 24 A. The police is a professional apparatus.

14:37:28 25 The PSS has its own special specialization, which is

14:37:32 1 different from that of the police. It was practically
14:37:38 2 like the internal security apparatus, with its focus
14:37:46 3 on political security. And we needed to merge these
14:37:54 4 people in order to rehabilitate them.

14:37:58 5 Q. All of the employees of each of those
14:38:01 6 agencies, police, intelligence, national security,
14:38:09 7 and PSS, they are all paid by the PA?

14:38:19 8 A. For sure.

14:38:40 9 THE WITNESS: Diet? I don't want "light."
14:38:40 10 You see me fat, but I don't -- I drink sugar.

14:38:43 11 OFFICIAL INTERPRETER BEN-NAIM: He said:
14:38:43 12 "I'm fat, but I'm eating sugar. I'm not diabetic."

14:38:44 13 MR. SCHOEN: To be clear, he was speaking
14:38:47 14 just with the waiter. He wasn't really answering any
14:38:50 15 question. He was just making a light comment to the
14:38:52 16 waiter.

14:38:53 17 THE WITNESS: People who work in security
14:38:55 18 don't get diabetes. They get pressure.

14:39:00 19 MR. SCHOEN: "Stress"?

14:39:01 20 OFFICIAL INTERPRETER AGHAZARIAN: "Stress."

14:39:01 21 Q. BY MR. SCHOEN: Each of these agencies, the
14:39:04 22 four agencies we spoke about, they're all units of the
14:39:13 23 PA, they all are part of the PA?

14:39:19 24 A. For sure. And this is agreed upon in the Oslo
14:39:32 25 agreement.

14:39:35 1 Q. Are you aware that there have been members
14:39:36 2 of law enforcement working for the PA who have also
14:39:48 3 been members of the PFLP at the same time?

14:39:59 4 A. Yes.

14:40:00 5 Q. Are you aware that there are members of --
14:40:03 6 sorry -- employees of the PA in law enforcement who
14:40:13 7 have engaged in terrorism while they were employed by
14:40:18 8 the PA?

14:40:28 9 (Brief exchange in Arabic among Official
14:40:36 10 Interpreter Ben-Naim, Check Interpreter Hazou,
14:40:36 11 and the witness.)

14:40:37 12 THE WITNESS: Members in the security that
14:40:38 13 have conducted operations? Correct, there is.

14:40:41 14 Q. BY MR. SCHOEN: Can you give me any names of
14:40:44 15 such people now?

14:40:49 16 A. I interrogated with somebody from Tulkarm,
14:40:51 17 and I believe he was in the national security. And
14:41:00 18 he was working in liaison, and he shot at the Israeli
14:41:09 19 army. I interrogated him and sent him to court.

14:41:21 20 Who else? From the security forces who
14:41:39 21 conducted operations -- I don't recall names.

14:41:49 22 Q. Part of your job in trying to combat
14:41:52 23 terrorism, fight against terrorism, requires you to
14:42:04 24 study organizations that -- whose members engage in
14:42:13 25 terrorism; correct?

14:42:20 1 A. I study factions, members -- I don't get the
14:42:26 2 question exactly.

14:42:27 3 I have -- I have taken a number of courses
14:42:31 4 in combating terrorism with American sponsorship. I
14:42:37 5 also took courses in Jordan, in Egypt, and the United
14:42:43 6 States, courses related to different mechanisms and
14:42:55 7 how to combat terror.

14:42:57 8 Q. Would you agree that, if you want to try
14:43:00 9 to stop terrorism, it would be helpful to know which
14:43:12 10 factions, if any, have as their mission or platform
14:43:28 11 a call for armed resistance, the use of arms, weapons?

14:43:38 12 A. Clarify the question, please.

14:43:40 13 Q. Yes.

14:43:42 14 Do you agree that it's important, in trying
14:43:51 15 to stop terrorism even before it starts, to know
14:44:00 16 whether a faction calls for the use of weapons and
14:44:09 17 armed resistance in their mission statement or platform?

14:44:14 18 MR. HIBEY: Let me object to that, because
14:44:17 19 you're conflating -- you're conflating the word "terror"
14:44:23 20 with "armed resistance." And that's a -- I believe
14:44:30 21 a misuse of terms. So I object.

14:44:44 22 MR. SCHOEN: Are you instructing the witness
14:44:46 23 not to answer?

14:44:47 24 MR. HIBEY: No. I'm asking you to re-form
14:44:52 25 your question.

14:44:53 1 MR. SCHOEN: The witness -- the witness
14:44:54 2 defined "terrorism" as "the use of weapons." I'm
14:44:58 3 using his definition of "terror" or "terrorism" that
14:45:00 4 I went over a couple of times with the witness.

14:45:02 5 MR. HIBEY: He did not equate it with the
14:45:03 6 use of the word "resistance." And that's what I'm
14:45:08 7 saying you have done, and that's where it's improper.

14:45:16 8 (Comment in Arabic by the witness.)

14:45:21 9 MR. HIBEY: No, there is no -- there is no
14:45:21 10 question pending.

14:45:23 11 MR. SCHOEN: There is a question pending.
14:45:24 12 If you instruct him not to answer --

14:45:25 13 MR. HIBEY: I'm not going to instruct him
14:45:27 14 to not answer. I'm just putting to you the -- my
14:45:31 15 objection.

14:45:34 16 MR. SCHOEN: For one second, let me just
14:45:38 17 clarify. During these kind of proceedings, which may
14:45:43 18 be different from what you're familiar with, there will
14:45:48 19 be times when a lawyer might object and instruct you
14:45:56 20 not to answer and other times when a lawyer might object
14:46:03 21 and you're free to still answer the question.

14:46:09 22 I would rely on your lawyer to instruct you,
14:46:13 23 if you are not to answer. And if the lawyer does not
14:46:22 24 instruct you not to answer, then the procedure is to
14:46:28 25 answer the question, unless Mr. Hibey disagrees with me.

14:46:37 1 I don't want to misstate the rule. I don't want to
14:46:43 2 misstate the rule or tell the witness what he should do.

14:46:53 3 THE WITNESS: I can speak about this subject.
14:46:59 4 I don't know if you are living here or you are familiar
14:47:03 5 with the circumstances we face.

14:47:08 6 Me, as Raed Taha, have been engaged in the
14:47:15 7 security work since 1995. My basic task, it is to
14:47:22 8 safeguard the peace with Israel and the -- and what
14:47:29 9 instructions I receive in this field.

14:47:34 10 We have been engaged in a confrontation
14:47:37 11 with Hamas. And what happened in Gaza is an outcome
14:47:45 12 of our involvement in this. And we were accused of
14:47:52 13 being traitors who work with Israel, and they killed
14:47:58 14 600 officers from our part. This is on the assumption
14:48:04 15 that we coordinate in the security field with the
14:48:08 16 Israelis.

14:48:13 17 And let it be known that there is coordination
14:48:17 18 between us and the Israeli side and with the Israeli
14:48:21 19 security. And I have sat with them more than once.
14:48:28 20 And I have been in several encounters with the Shabak
14:48:32 21 consultants, advisors. And there is joint cooperation
14:48:40 22 between us since the PA assumed its authority until now.

14:48:48 23 Despite all such difficulties and despite
14:48:52 24 all the difficulties that we confronted and faced
14:48:55 25 from 2000 onwards, and our headquarters and offices

14:49:04 1 have been demolished, and for two days the building
14:49:10 2 I was working in was shelled, the planes were shelling
14:49:18 3 the headquarters when I was inside the building, and
14:49:25 4 in this prison, there were inmates which were held
14:49:31 5 from Hamas and other factions, and these people were
14:49:36 6 there, we did not release them, complying with the law
14:49:40 7 and peace.

14:49:46 8 And when the Israelis entered -- marched into
14:49:54 9 the building where I was working in interrogation, they
14:49:59 10 detained me and them, together with the other detainees.
14:50:03 11 These people were accused of planning or conducting
14:50:09 12 actions against Israelis, and I was interrogating them
14:50:14 13 and bringing them to court, and I find out that I am
14:50:19 14 together with them in the same prison. In a certain
14:50:25 15 given period, we were not capable to protect ourselves
14:50:32 16 or our offices.

14:50:39 17 Despite that, we used to shackle some of
14:50:44 18 the prisoners with our own hands. And I think that
14:50:53 19 the Israeli army knows about this. We used to sit
14:50:57 20 with them in the wilderness or in the ranches because
14:51:02 21 we could not release them, in order to stick to our
14:51:07 22 obligations, and from another angle also, to protect
14:51:14 23 their lives. During that period, we remember also
14:51:20 24 that the Israeli army shelled the Nablus prison.
14:51:23 25 And I believe twelve people were killed then.

14:51:29 1 All of this we bore, we shouldered the
14:51:34 2 responsibility. Me, in my work and function in the PSS,
14:51:42 3 safeguarded the peace, because I am committed, I am
14:51:47 4 convinced by it and believe in it. And I hope that
14:51:52 5 it will be completed, complete. I hope during this
14:52:01 6 period I have been able to abort, in a very significant
14:52:09 7 way, operations against Israel, until we became socially
14:52:15 8 outcast because of these tasks that we do.

14:52:19 9 But I believe in a certain idea, and I
14:52:24 10 am struggling again for it at a time when the PA is
14:52:32 11 currently crumbling, falling apart. But we, as the
14:52:40 12 security officers, believe in peace, and we will
14:52:44 13 combat for it.

14:52:46 14 I remember a case in which a certain person
14:52:50 15 is involved currently, somebody called Islam Arouri,
14:52:54 16 who is a Palestinian with an American citizenship.
14:53:05 17 He came to Palestine two or more years ago. And he
14:53:11 18 had prepared the missiles from -- RPG kind. And he
14:53:18 19 wanted to shell us and the Israelis with these rockets.
14:53:26 20 We, as security, were targeted. We aborted this
14:53:35 21 terrorist action. And if we did not able to foil it,
14:53:43 22 there would have been a disaster. [sic]

14:53:47 23 And I remember a citation that Mr. Barak
14:53:50 24 has sent, that no country in the world or no security
14:53:57 25 apparatus anywhere in the world, to prevent somebody

14:54:02 1 who wants to kill himself. Thank you.

14:54:07 2 Q. BY MR. SCHOEN: It's fair to say that you
14:54:09 3 understand your primary job, since you've been a
14:54:18 4 security officer, to be to stop any group or any
14:54:26 5 person from the use of weapons to stop the peace
14:54:37 6 process?

14:54:43 7 A. Yeah, yeah. It's true.

14:54:50 8 Q. Would you agree that, if a group, a faction,
14:54:55 9 has as its mission or platform the legitimacy that
14:55:04 10 it's okay, tells its members that it's okay -- tells
14:55:11 11 its members that it's okay to use weapons to --

14:55:23 12 A. This is why we confronted Hamas from the
14:55:26 13 outset until today, because openly it was against the
14:55:32 14 peace accords.

14:55:33 15 Q. Because Hamas was against the peace accords,
14:55:40 16 and the official position of Hamas is that it's okay to
14:55:48 17 use weapons to fight against the peace process?

14:56:02 18 A. Once again, I was combating Hamas because
14:56:11 19 they have used weapons and their opposition to the
14:56:16 20 peace process.

14:56:17 21 Q. Yes. And not only use weapons, but they tell
14:56:22 22 its members and say publicly that it's okay to use
14:56:30 23 weapons to fight against the peace process?

14:56:39 24 A. The suicide operations that were carried
14:56:42 25 out within Israel, basically it was harmful for us

14:56:48 1 as Palestinians. It was harmful to our own interests.

14:56:55 2 The main objective from these operations was to destroy
14:57:01 3 the PA.

14:57:03 4 Q. I understand.

14:57:03 5 I am only asking you: One reason you
14:57:06 6 consider -- well, strike that.

14:57:09 7 You consider Hamas to be a terrorist
14:57:12 8 organization?

14:57:20 9 MR. HIBEY: This calls for a legal conclusion.
14:57:23 10 Object.

14:57:33 11 THE WITNESS: What do you mean by a "terrorist
14:57:38 12 organization"?

14:57:39 13 Q. BY MR. SCHOEN: Hamas is against the peace
14:57:42 14 process; right?

14:57:51 15 A. Currently?

14:57:53 16 Q. Yes.

14:57:54 17 A. I consider that any action, regardless of
14:57:58 18 the perpetrator, if this targets civilians, I consider
14:58:07 19 it a terrorist action. Currently, Hamas could be with
14:58:12 20 the peace process.

14:58:15 21 Q. Do you consider an organization that puts
14:58:20 22 forward a public position that the use of weapons
14:58:29 23 to fight against the peace process is okay, do you
14:58:39 24 consider such an organization, in your opinion as a
14:58:42 25 law enforcement officer for the PA, to be a terrorist

14:58:51 1 organization?

14:59:04 2 A. Any party that carries out an action of
14:59:07 3 a military nature against civilians, whether it is
14:59:14 4 Palestinian or Israeli, and any party that acts against
14:59:20 5 peace, I consider it a terrorist organization. But I'm
14:59:26 6 not from Hamas, and I don't know currently what is their
14:59:34 7 political position. I know that Hamas has prohibited
14:59:42 8 and denounced throwing rockets from Gaza.

14:59:49 9 There are people from Fatah maybe who carried
14:59:53 10 out an action of a military nature. This doesn't mean
14:59:59 11 that Fatah is a terrorist organization. There are lots
15:00:05 12 of individual actions that do happen. They happen by
15:00:11 13 individual initiative. I cannot say, for instance,
15:00:18 14 that Fatah is responsible for such violations.

15:00:26 15 Me, as somebody from the security field, I
15:00:29 16 had no instructions, and we used to have an item under
15:00:29 17 protecting the armed resistance --

15:00:30 18 (Technical interruption in the proceedings.)

15:03:34 19 THE VIDEOGRAPHER: Going off the record at
15:03:34 20 3:02.

15:03:34 21 (Recess from 3:02 p.m. to 3:13 p.m.)

15:11:36 22 THE VIDEOGRAPHER: Going back on the record
15:11:57 23 at 3:13.

15:12:07 24 Q. BY MR. SCHOEN: Mr. Raed, based on your
15:12:11 25 experience as a law enforcement officer, would you

15:12:14 1 agree that, in fighting against terrorism, it's
15:12:22 2 important to know where a terrorist organization
15:12:27 3 is getting its money from?

15:12:40 4 A. Of course.

15:12:42 5 Q. Were you involved at all, directly you,
15:12:46 6 Mr. Raed, in the investigation into the bombing in
15:12:54 7 Karnei Shomron in February of two -- the bombing that
15:13:02 8 occurred in February of 2002 -- 2002?

15:13:18 9 A. My role was to supervise the general
15:13:25 10 interrogation in the West Bank, not in an immediate way.
15:13:31 11 It was the legal supervision, expose and follow legal
15:13:37 12 procedures with the tribunals and safeguard the legal
15:13:43 13 procedures against the -- those people.

15:13:49 14 I remember, during that period in 2002, the
15:13:53 15 PA areas were under siege. And the area of Kalkiliya --
15:14:05 16 and you can easily verify this -- was under siege.
15:14:09 17 The Israeli authorities were besieging the whole town
15:14:15 18 of Kalkiliya. And I think they made an incursion into
15:14:22 19 Kalkiliya in 2001.

15:14:27 20 And me, as a security officer, was --
15:14:29 21 was unable to move from one governorate to another.
15:14:38 22 Despite such hardship, the interrogation and the
15:14:46 23 follow-up continued, pursued on behalf of the PSS.
15:14:50 24 And we had instructions from the president at the
15:14:53 25 time to chase those people and to prevent such

15:15:00 1 operations.

15:15:01 2 Q. To chase which people?

15:15:06 3 A. Anybody that carries arms other than the
15:15:13 4 PA elements.

15:15:16 5 Q. Meaning official PA policemen or PSS people?

15:15:26 6 A. The legal weapons.

15:15:28 7 Q. And the only people who legally would have
15:15:32 8 weapons would be the PA police?

15:15:38 9 A. Correct. People working for the PA.

15:15:44 10 Q. Now, specifically, though, after the
15:15:51 11 bombing in Karnei Shomron in February of 2002, were
15:15:59 12 you involved -- you, Mr. Raed -- in the investigation,
15:16:03 13 not just supervising, but the investigation?

15:16:18 14 A. My role was to listen to the statements of
15:16:26 15 the accused and prepare charge sheets and referring
15:16:35 16 them to trial. Those who do the investigation and
15:16:40 17 information gathering are other elements. My role
15:16:47 18 was -- my role was to package the dossier and refer
15:16:54 19 it to trial.

15:16:57 20 We at the PSS, we have our main headquarters
15:17:03 21 based in Ramallah. This headquarters supervises the --
15:17:11 22 our operations in the West Bank in a full way, and it
15:17:15 23 receives instructions from this headquarters. And
15:17:22 24 the interrogation used to happen through the main
15:17:28 25 headquarters. And my role was within such a context.

15:17:33 1 Q. I want to focus specifically on this Karnei
15:17:40 2 Shomron bombing.

15:17:45 3 Are you prepared to testify today what
15:17:48 4 specific steps, if any, were taken by the PA or any
15:18:01 5 of its offices to investigate this specific bombing,
15:18:07 6 who did it -- who did it, what happened, any of the
15:18:19 7 relevant facts related to the bombing?

15:18:27 8 A. May I answer in the following manner: Our
15:18:33 9 work during that given period was preventing any armed
15:18:37 10 action. We were -- we were confident, we were sure
15:18:45 11 the danger that would emanate from any operation and
15:18:52 12 its negative impact on the PA. And despite all the
15:18:57 13 difficulties and the siege that we were facing, we were
15:19:02 14 moving, trying to abort any kind of action. And if we
15:19:10 15 knew that any operation is about to be carried out, we
15:19:14 16 would have acted in order to prevent it, for sure.

15:19:22 17 After we knew about the operation, we held
15:19:24 18 interrogation, to know the perpetrator or who were
15:19:33 19 behind this action.

15:19:36 20 Q. With respect to this bombing, Karnei Shomron
15:19:40 21 bombing, what steps were taken to investigate all of
15:19:52 22 the facts?

15:20:03 23 A. I recall that, after the PFLP claimed
15:20:10 24 responsibility for carrying out this operation, we
15:20:14 25 detained members of the PFLP and interrogated them

15:20:20 1 in order to know who stands behind this operation.

15:20:29 2 At the same time, the Israeli army has
15:20:32 3 undertaken interrogation and search. And I assure that,
15:20:42 4 during that given period, we did not have any control
15:20:46 5 over the area of Kalkiliya. Despite that, we went
15:20:51 6 ahead and helped. And this is our duty, to round up
15:20:58 7 people who stand behind this operation, and punishing
15:21:03 8 them.

15:21:09 9 MR. SCHOEN: What?

15:21:10 10 OFFICIAL INTERPRETER AGHAZARIAN: "And
15:21:12 11 punishing them."

15:21:14 12 Q. BY MR. SCHOEN: Do you know who was detained
15:21:16 13 in connection with this investigation?

15:21:23 14 A. I know that members of the PFLP were arrested,
15:21:28 15 but I don't recall their names now. At the time, there
15:21:36 16 were arrests of PFLP members in all areas, particularly
15:21:51 17 those whom we believed were carrying weapons.

15:21:59 18 Q. Were you involved with the interrogation
15:22:01 19 of any of the people suspected or interrogated in
15:22:03 20 connection with the Karnei Shomron bombing?

15:22:15 21 A. At the time, Kalkiliya was closed. Neither
15:22:24 22 people from Kalkiliya nor from outside Kalkiliya had
15:22:29 23 access. And if we come back to the date, the whole
15:22:34 24 West Bank was closed at the time. If it was open,
15:22:42 25 if I could make it, I would have headed to Kalkiliya.

15:22:47 1 But I'm sure that I could not make it to Kalkiliya
15:22:50 2 at the time.

15:22:52 3 Q. So is the answer no, you were not -- you,
15:22:58 4 Mr. Raed, were not involved in the detention or
15:23:02 5 interrogation of the suspects?

15:23:11 6 A. I mentioned that our role was monitoring
15:23:15 7 and supervising from a distance. But due to the
15:23:19 8 circumstances, we did not have access. But we were
15:23:25 9 in touch through telephone, through fax, that we were
15:23:30 10 communicating.

15:23:32 11 Q. Whatever the reason was, were you, Mr. Raed,
15:23:35 12 involved directly in the detention or interrogation
15:23:40 13 of any people in connection with the Karnei Shomron
15:23:52 14 bombing?

15:23:55 15 CHECK INTERPRETER HAZOU: He mentioned -- you
15:23:57 16 mentioned "directly," "were you directly involved"?

15:24:02 17 MR. SCHOEN: Yes. Did you interrogate?

15:24:02 18 Well, strike that.

15:24:05 19 CHECK INTERPRETER HAZOU: Yes. I don't think
15:24:06 20 Shimon heard the word "directly."

15:24:08 21 MR. SCHOEN: Okay. Let me strike the
15:24:08 22 question.

15:24:10 23 Q. BY MR. SCHOEN: Did you, Mr. Raed, personally
15:24:16 24 interrogate any person in relation to the bombing in
15:24:21 25 Karnei Shomron?

15:24:23 1 A. What do you mean by "directly"?

15:24:32 2 CHECK INTERPRETER HAZOU: No, no.

15:24:33 3 "Personally."

15:24:34 4 OFFICIAL INTERPRETER AGHAZARIAN: "Personally."

15:24:37 5 OFFICIAL INTERPRETER BEN-NAIM: I can

15:24:39 6 re-translate.

15:24:39 7 THE WITNESS: Maybe give instructions,

15:24:43 8 supervise, give instructions, follow up with the

15:24:48 9 relevant officers, with the -- with the court.

15:24:58 10 In a personal way that I was involved in

15:25:02 11 investigating, the answer is "no." As I mentioned,

15:25:09 12 the closure and the siege imposed by the Israelis

15:25:16 13 impeded from my having access to Kalkiliya.

15:25:19 14 Q. BY MR. SCHOEN: Okay. What steps did you

15:25:21 15 personally take with respect to this bombing, the

15:25:25 16 Karnei Shomron bombing?

15:25:30 17 I'm asking now that you remember specifically,

15:25:33 18 not what might have happened, but what you remember

15:25:37 19 specifically.

15:25:48 20 A. Specific things: I have conducted telephone

15:25:56 21 calls over the matter. I followed up the procedures

15:26:05 22 of investigation and search. I requested to follow

15:26:19 23 instructions and to find out who stands behind this

15:26:25 24 operation. Maybe I have talked to the judicial and

15:26:31 25 to the prosecution. These measures I have certainly

15:26:39 1 conducted.

15:26:41 2 Q. Do you have anyplace a file, any papers or
15:26:44 3 any computer file, that would help you remember what,
15:26:48 4 if anything, you did?

15:27:07 5 To be clear, when I'm asking of "you," I
15:27:11 6 mean you or the PA or anyone you're aware of.

15:27:17 7 A. You may find it with the Israeli army.
15:27:22 8 Because they have broke into Kalkiliya and into the
15:27:27 9 headquarters of the PSS, and they have taken all those
15:27:31 10 documents. And the headquarters where I was working
15:27:39 11 in Ramallah has been shelled and burned, burnt into
15:27:46 12 ashes.

15:27:47 13 Q. Is it your testimony that the Israeli
15:27:50 14 government took every document related to this --
15:27:53 15 the investigation into the Karnei Shomron bombing?

15:28:04 16 A. Maybe they demolished them. It was a process
15:28:09 17 of shelling and breaking in, an incursion, and the
15:28:16 18 situation was chaotic.

15:28:18 19 Q. When did that happen, when was this bombing
15:28:21 20 and destruction in Kalkiliya?

15:28:31 21 A. The first time 2001. Then I believe in 2004.
15:28:44 22 More than once.

15:28:46 23 Q. In Kalkiliya?

15:28:47 24 A. Yes.

15:28:50 25 Q. And the bombing happened around February,

15:28:53 1 in February of 2002; correct?

15:29:03 2 A. I don't remember the exact date.

15:29:06 3 Q. All right. I represent to you that the
15:29:09 4 bombing we're talking about here happened on or about
15:29:12 5 February 16, 2002.

15:29:20 6 A. And the incursion into the West Bank happened
15:29:33 7 in 2004.

15:29:35 8 Q. This investigation that you supervised into
15:29:40 9 the bombing, do you remember when that took place?

15:29:49 10 A. After the operation.

15:29:51 11 Q. A month after? Two months after?

15:30:02 12 A. Actions started the moment that the operation
15:30:05 13 was conducted. An issue like this you cannot postpone.
15:30:12 14 This has to do with the whole -- with the entire future
15:30:17 15 of the PA.

15:30:20 16 Q. And you had telephone calls with people who
15:30:23 17 were investigating and interrogating the suspects?

15:30:35 18 A. Correct. Correct.

15:30:37 19 Q. Where were you at that time, if you remember?

15:30:44 20 A. I was in Ramallah, in the main headquarters
15:30:48 21 of the PSS.

15:30:50 22 Q. Did you make any notes of your telephone
15:30:53 23 calls?

15:31:08 24 A. There was a full file that was there.

15:31:14 25 Q. What was in that file?

15:31:19 1 A. It was burned. It burned into flames. All
15:31:26 2 the papers went into ashes in the headquarters where
15:31:31 3 I was working. It was shelled by helicopter gunships,
15:31:35 4 and the whole archive went aflame.

15:31:42 5 Q. And how about -- were there some documents
15:31:44 6 that stayed in Kalkiliya after the investigation?

15:31:52 7 A. What do you mean?

15:31:55 8 Q. Well, if an investigator in Kalkiliya
15:31:57 9 interrogated someone in Kalkiliya, would a copy of
15:32:06 10 his notes, if he took any, stay in Kalkiliya?

15:32:17 11 A. Sir, when the Israeli incursion took place
15:32:22 12 to the various areas, they entered into all the security
15:32:28 13 headquarters, and they have shelled most of it. And
15:32:34 14 they have burned all what was inside.

15:32:38 15 In the given period, there was no such thing
15:32:42 16 as Palestinian security. We could not leave our houses,
15:32:46 17 get out from our houses.

15:32:48 18 I remember, during this given period --
15:32:51 19 and I respect this Israeli officer -- I was living in
15:32:57 20 Ramallah. I had my son, Kussay, three years old, who
15:33:04 21 went out from the house. I saw him in the street. I
15:33:10 22 could not go out and fetch him. The instructions were
15:33:18 23 anybody leaving his house will be shot at. So I left
15:33:25 24 my son in the street lest I would be shot myself, until
15:33:31 25 this officer came. He -- he brought him to my house.

1 During that period, we did not have any
2 headquarters. They were shelled. We were chased,
3 on the run, and we were wanted. And even after the
4 Israeli army left, they -- the public entered into
5 these headquarters. There wasn't any files which were
6 there. And many of the equipment were maybe stolen or
7 shelled. I saw somebody running away with a TV, a unit
8 from our headquarters, and there was nothing I could
9 do to him. In a given period, we were not there at all.

10 Q. Is it your testimony that all of the files
11 related to this case that were in Kalkiliya were either
12 destroyed or taken by the Israelis?

13 A. This is not certain. Maybe there are certain
14 documents that do exist with certain offices. And this
15 requires research into.

16 Q. Has any search been made that you're aware of?

17 A. I myself have conducted a search, and I reach
18 to nothing.

19 Q. What offices do you think would be possible
20 would have such documents, given your experience?

21 A. The security headquarters, courts, only.

22 Q. You're not aware of any prosecution, judicial
23 prosecution in this case, are you?

24 A. Maybe certain people were detained.

25 MR. SCHOEN: Time's up.

15:36:27 1 THE VIDEOGRAPHER: Going off the record at
15:36:28 2 3:37.

15:51:37 3 (Recess from 3:37 p.m. to 3:53 p.m.)

15:51:41 4 THE VIDEOGRAPHER: Going on the record at
15:51:42 5 3:53.

15:51:47 6 Q. BY MR. SCHOEN: Mr. Raed, during the time
15:51:50 7 period of this Karnei Shomron bombing, who was working
15:51:57 8 for the PA in law enforcement in Kalkiliya?

15:52:00 9 A. The security officers. Who else?

15:52:18 10 Q. What were their names?

15:52:21 11 A. Iyad Aqra'a, he was the head of the PSS in
15:52:35 12 Kalkiliya. The legal person was Yasser Abu Libdeh.
15:52:48 13 These were the officers among the people I recall,
15:52:52 14 that I know them quite well.

15:52:55 15 Q. Do you remember anyone else who was working
15:52:57 16 for the PA and law enforcement in Kalkiliya during
15:53:02 17 that time period?

15:53:11 18 A. In Kalkiliya? There was -- who was it?

15:53:16 19 Every two years, they are transferred from
15:53:22 20 one place or another. I remember exactly those two.
15:53:29 21 I remember somebody -- I think his name is Hussam
15:53:36 22 Al-Sheikh. These are -- I am sure that they were
15:53:42 23 around, and I was following up matters with them.

15:53:46 24 Q. So these are the people you spoke with on
15:53:49 25 the telephone when you were speaking with the telephone

15:53:50 1 about -- on the telephone with someone about the
15:53:53 2 investigation into this bombing?

15:54:03 3 A. I answered this question previously.

15:54:06 4 Q. If those were the three people?

15:54:08 5 A. These are the people I remember, because those
15:54:11 6 were the people with whom I followed up matters.

15:54:17 7 Q. Where are they now, if you know?

15:54:19 8 A. Iyad Al-Aqra'a is now the head of the Ramallah
15:54:26 9 branch. Yasser is still in Kalkiliya. And Hussam
15:54:30 10 Al-Sheikh is in Ramallah.

15:54:36 11 Q. With the PSS? They work with the PSS?

15:54:40 12 A. Iyad is the head of the Ramallah PSS now,
15:54:46 13 currently. Yasser is the legal person who -- and,
15:54:52 14 currently, he is in charge of the legal section in
15:54:54 15 Kalkiliya. They are all in the PSS.

15:55:00 16 Q. Where were the PA headquarters located in
15:55:03 17 Kalkiliya during that time period?

15:55:11 18 A. It was inside the city. It was a rented
15:55:18 19 building in the heart of the city. Currently, we
15:55:22 20 have constructed a different building.

15:55:25 21 Q. During that time period, do you remember
15:55:27 22 the street in Kalkiliya where the PA offices were?

15:55:31 23 (Pending question partially translated.)

15:55:32 24 OFFICIAL INTERPRETER BEN-NAIM: "Do you
15:55:33 25 remember"?

15:55:34 1 MR. SCHOEN: "The street where the PA office
15:55:36 2 was."

15:55:36 3 (Remainder of pending question translated.)

15:55:42 4 THE WITNESS: I remember the headquarters,
15:55:45 5 but I don't recall the name of the street.

15:55:46 6 Q. BY MR. SCHOEN: Is it your testimony that the
15:55:48 7 PA headquarters in Kalkiliya were destroyed?

15:56:01 8 MR. HIBEY: Excuse me. Did you say "the PA
15:56:04 9 headquarters"?

15:56:06 10 MR. SCHOEN: Yes, in Kalkiliya.

15:56:08 11 THE WITNESS: What do you mean by
15:56:10 12 "demolition"? Is it shelling it or --

15:56:13 13 Q. BY MR. SCHOEN: I thought you told me earlier
15:56:15 14 that the PA offices --

15:56:20 15 A. There are certain headquarters that were
15:56:22 16 leveled down. And there are areas where they broke
15:56:29 17 into, the army barging in, not shelling from the air.
15:56:40 18 The PSS is one of the locations, premises, that were --
15:56:47 19 they broke into them.

15:56:49 20 Q. The PSS headquarters they broke into but did
15:56:54 21 not destroy?

15:57:00 22 A. It hasn't been demolished fully. There were
15:57:03 23 some damage, but mostly it was breaking into.

15:57:07 24 Q. And how do you know that the files from the
15:57:10 25 investigation into this case no longer exist?

15:57:18 1 A. Because there was no security left in the --
15:57:21 2 in the country. The security officers left their
15:57:29 3 offices and they left. And it was the Israeli army
15:57:35 4 that was present in Kalkiliya.

15:57:37 5 Q. If you know, during what period of time
15:57:41 6 were the records in Ramallah -- no, Ramallah -- were
15:57:48 7 the records in Ramallah, during what period of time,
15:57:54 8 destroyed --

15:58:07 9 MR. SCHOEN: "Were the records in Ramallah
15:58:07 10 destroyed."

15:58:07 11 CHECK INTERPRETER HAZOU: "Ramallah."

15:58:07 12 MR. SCHOEN: "Ramallah." Ramallah, Ramallah.

15:58:09 13 OFFICIAL INTERPRETER BEN-NAIM: One more time.
15:58:11 14 Sorry. Sorry.

15:58:12 15 Q. BY MR. SCHOEN: Your testimony earlier was
15:58:15 16 that all law enforcement records related to this bombing
15:58:20 17 that were in Ramallah were destroyed when Ramallah was
15:58:25 18 attacked; correct?

15:58:32 19 A. Look, once again: The main headquarters
15:58:39 20 always has a copy of the interrogations. And this
15:58:48 21 is the PSS headquarters in Bitunya. All the dossiers
15:58:56 22 in the West Bank must have a copy in this headquarters.
15:59:05 23 For sure, a copy of this file was there in this
15:59:10 24 headquarters.

15:59:12 25 This is the headquarters where I was working

15:59:16 1 in. And this has been completely demolished, leveled
15:59:26 2 down. And it was shelled by the airplanes and there
15:59:29 3 was burned into ashes. And you can refer and see the
15:59:36 4 pictures. They are all out there.

15:59:39 5 Q. Okay. In which offices -- name each of
15:59:42 6 the offices that would have a record or a file from
15:59:53 7 the investigation into this kind of incident, in the
16:00:01 8 ordinary procedures for law enforcement within the
16:00:04 9 PA during that time period?

16:00:11 10 A. The equipment or we as PSS --

16:00:16 11 CHECK INTERPRETER HAZOU: No, no, no.

16:00:22 12 OFFICIAL INTERPRETER BEN-NAIM: "Apparatus."

16:00:18 13 (Brief exchange in Arabic among Official

16:00:19 14 Interpreter Aghazarian, Official Interpreter

16:00:19 15 Ben-Naim, and Check Interpreter Hazou.)

16:00:24 16 OFFICIAL INTERPRETER AGHAZARIAN: "Other
16:00:25 17 apparatus than the PSS, you mean?"

16:00:27 18 Q. BY MR. SCHOEN: I mean every place where
16:00:30 19 there would be a copy of a document related to an
16:00:34 20 investigation like this that you're aware of.

16:00:39 21 A. The PSS and the relevant bodies, such as
16:00:46 22 interrogation and police and security, and the General
16:00:52 23 Intelligence Services.

16:00:53 24 Q. Where are the offices located, physically
16:00:56 25 where?

16:01:02 1 A. The PSS in Kalkiliya and Ramallah, and the
16:01:07 2 General Intelligence, I don't know, because I don't
16:01:10 3 work for them.

16:01:12 4 Q. Is it possible they could have a file still
16:01:15 5 from this bombing investigation?

16:01:24 6 A. Of course. It was a relevant party that has
16:01:28 7 the mandate, and it has made the interrogation.

16:01:34 8 Q. So is it possible they could have a copy of
16:01:37 9 the file?

16:01:40 10 A. Possible.

16:01:41 11 Q. Do you know whether there was a PFLP office
16:01:45 12 in Kalkiliya?

16:01:47 13 A. I'm not a resident of Kalkiliya. I don't
16:01:58 14 know.

16:01:59 15 Q. I'm asking you as a law enforcement officer.

16:02:08 16 A. I know that the PFLP, as one of the
16:02:13 17 Palestinian factions, has its headquarters in Ramallah.
16:02:19 18 But I'm not sure if they have an office in Kalkiliya.

16:02:22 19 Q. Do you know who pays for that PFLP
16:02:25 20 headquarters in Ramallah?

16:02:30 21 A. I don't know.

16:02:32 22 What do you mean by "funding"?

16:02:34 23 Q. I mean who pays the rent for an office.

16:02:37 24 Does the PA pay the rent?

16:02:52 25 A. Paying the rent of the PFLP? This is a

16:02:57 1 political matter. I don't know.

16:03:00 2 Q. You're not prepared to talk today about who
16:03:04 3 pays for the rent for any PFLP office?

16:03:11 4 A. It's not that I'm not ready. I simply don't
16:03:17 5 know.

16:03:18 6 Q. I understand.

16:03:19 7 Do you know anything at all -- no, strike
16:03:22 8 that.

16:03:23 9 Are you prepared to testify today about any
16:03:27 10 of the banking records of the PA with -- to the extent
16:03:36 11 those banking records reflect payment or income?

16:03:40 12 (Pending question partially translated.)

16:03:46 13 OFFICIAL INTERPRETER BEN-NAIM: "Income" or?

16:03:49 14 MR. SCHOEN: Payments or income or requests
16:03:51 15 for payment from the PFLP.

16:03:56 16 OFFICIAL INTERPRETER BEN-NAIM: To the PA?

16:03:59 17 MR. SCHOEN: From the PA to the PFLP.

16:04:03 18 (Remainder of pending question translated.)

16:04:11 19 THE WITNESS: I didn't understand the
16:04:13 20 question.

16:04:19 21 Q. BY MR. SCHOEN: All right. Are you prepared
16:04:21 22 to testify about any requests for payment, requests made
16:04:26 23 by the PFLP for the PA to pay any money?

16:04:38 24 A. This is a topic, me as Raed, I don't know
16:04:42 25 anything. Maybe you can address this question to the

16:04:47 1 PLO or the PFLP, and it could be an issue that has
16:04:54 2 political connotations.

16:04:56 3 We at the PA have monitoring about the money
16:05:03 4 transfers. This is done in cooperation with Israel,
16:05:10 5 the United Nations, the other Arab countries. Any
16:05:23 6 transfer through the banks, it is something that we
16:05:26 7 monitor. We know the source and where these funds
16:05:30 8 are heading.

16:05:36 9 Especially in recent times, the screws
16:05:39 10 have been tightened, particularly of what Hamas gets.
16:05:44 11 And we held lots of amounts pertaining to Hamas in
16:05:53 12 this respect. This issue is contrary to the law.

16:05:59 13 But any internal issue having to do with PFLP
16:06:04 14 and its relation with the PA is a political issue that
16:06:09 15 is not something I know of. My role is security. I
16:06:14 16 have nothing to do with politics.

16:06:18 17 Q. How about funding for the PFLP? You testified
16:06:23 18 that you monitor funding, source of funds.

16:06:33 19 Do you monitor funds received by the PFLP?

16:06:46 20 A. From what -- during these few years, you know,
16:06:52 21 there is nothing I remember in this respect. There are
16:06:58 22 funds that were addressed to Hamas and Jihad we were
16:07:05 23 able to hold. But about the PFLP, I have no idea.

16:07:12 24 Q. You don't know anything from the time period
16:07:15 25 1994 to today about the payment of funds to the PFLP

16:07:22 1 from any source, including the PA?

16:07:32 2 A. The PA, this is an internal issue, and I don't
16:07:38 3 know anything about it. As I said, that if this matter
16:07:44 4 is there, this is a political and a non-security issue.
16:07:50 5 It's outside my realm. My role as security, I monitor
16:07:57 6 the influx of illegal money into Palestine. That's it.

16:08:04 7 Q. Would you agree that, if the PFLP or its
16:08:10 8 members were engaged in terror activity, it would be
16:08:16 9 relevant to you, as a law enforcement officer, to know
16:08:25 10 the source of the money that they're getting?

16:08:32 11 MR. HIBEY: It's a compound question. I'll
16:08:35 12 object to the form. Objection to the form.

16:08:47 13 THE WITNESS: This is the nature of my task.

16:08:47 14 CHECK INTERPRETER HAZOU: What did you say?

16:08:54 15 THE WITNESS: This is the nature of my work.

16:08:57 16 Q. BY MR. SCHOEN: Do you work in connection,
16:09:00 17 in conjunction with, do you work together with the
16:09:04 18 United States in monitoring funds in such situations?

16:09:23 19 A. If they have information, they inform us
16:09:27 20 about it. And if we have information regarding persons
16:09:36 21 residing in America or living in America, we inform
16:09:40 22 them of it. There is coordination at this level.

16:09:44 23 Q. Are you aware that the United States has
16:09:47 24 designated the PFLP as a terrorist organization?

16:09:58 25 A. I don't know.

16:10:00 1 Q. You're not aware of that?

16:10:05 2 A. The United States considering the PFLP as a
16:10:09 3 terrorist organization?

16:10:11 4 Q. That was my question to you.

16:10:12 5 Are you aware of that?

16:10:20 6 A. I deal with people based on the Palestinian
16:10:23 7 law.

16:10:25 8 Q. I was just asking you if you were aware that
16:10:28 9 the United States --

16:10:30 10 MR. HIBEY: I think the question has been
16:10:32 11 asked and answered.

16:10:50 12 OFFICIAL INTERPRETER BEN-NAIM: Excuse me.
16:10:50 13 I didn't hear you.

16:10:50 14 (Comment in Arabic by Official Interpreter
16:10:50 15 Aghazarian.)

16:10:51 16 OFFICIAL INTERPRETER BEN-NAIM: He told him
16:10:52 17 that the witness -- sorry.

16:11:06 18 THE WITNESS: I answered that I act based
16:11:08 19 on the Palestinian laws.

16:11:12 20 Q. BY MR. SCHOEN: That's not an answer to my
16:11:13 21 question.

16:11:14 22 My question is: Are you aware that the United
16:11:17 23 States has designated the PFLP a terrorist organization?
16:11:26 24 Whether you act on the basis of PA law or otherwise, are
16:11:34 25 you aware?

16:11:37 1 A. No.

16:11:40 2 Q. Does the PA consider the PFLP a terrorist
16:11:47 3 organization?

16:11:52 4 A. The PFLP as a political organization? It is
16:11:58 5 one of the factions that constitute the PLO, and it's
16:12:05 6 the PLO that have signed the accords with Israel. And
16:12:11 7 I know that the PFLP complied with the Oslo agreement,
16:12:18 8 even if at the same time it has its own reservations.
16:12:21 9 And the PFLP, as a political organization, is not a
16:12:29 10 terrorist organization.

16:12:30 11 Q. Is any part of the PFLP a terrorist
16:12:33 12 organization, in your view?

16:12:47 13 A. Once again, I respond to the same question.
16:12:52 14 Any person, regardless of the political faction,
16:12:58 15 that does a belligerent act against any civilian for
16:13:08 16 political objectives, I deal with him as a terrorist.
16:13:14 17 This is the stipulation of the Palestinian law.

16:13:18 18 And the Palestinian penal code that is applied
16:13:26 19 in Palestine, including the Jordanian penal law, which
16:13:33 20 is in application currently in Palestine, and the bylaws
16:13:38 21 of the PLO that was in implementation in military and
16:13:47 22 the state security courts, consider such actions as
16:13:50 23 a crime which is punishable by law.

16:13:57 24 In addition to that, instructions of the PA,
16:14:06 25 starting from the president and on -- and this continues

16:14:11 1 to be in implementation in dealing with such factions --
16:14:16 2 that they are groups that are outside the law and should
16:14:24 3 be chased and punished. And this applies on Fatah,
16:14:35 4 PFLP, and all other factions.

16:14:42 5 And the political decision existing within
16:14:45 6 the PA is only the decision of the PA, which is binding
16:14:50 7 and committed to the peace process, not -- regardless
16:14:56 8 of the factions. And in all operations, the PA, that
16:15:09 9 the presidency in Palestine consider any such operations
16:15:16 10 as terrorist operations and resent it, rejected it, and
16:15:23 11 ordered the security agencies to chase the perpetrators.

16:15:31 12 And I believe that 2001, 2002, I don't
16:15:37 13 remember exactly, maybe 2000, something around there,
16:15:44 14 maybe probably after the Ze'evi affair, a presidential
16:15:49 15 decree was issued to consider the military wing of
16:15:53 16 the PFLP a body or an entity that is prohibited and
16:16:04 17 illegitimate and shady and outside legitimate. And
16:16:10 18 this decision was a kind of a confirmation on the
16:16:16 19 implementation of the law that prohibits such actions.

16:16:21 20 Q. Who was the leader of the PFLP at that time,
16:16:25 21 when you believe that the military wing was outlawed?

16:16:34 22 A. I remember Abu Ali Mustafa, who was killed in
16:16:40 23 Ramallah by Israeli planes, and Ahmed Sa'adat, who is
16:16:52 24 currently in prison, Israeli prison.

16:16:56 25 Q. Mr. Mustafa was killed before Ze'evi --

16:16:59 1 Mr. Ze'evi was killed; right?

16:17:03 2 A. For sure.

16:17:04 3 Q. So Ahmed Sa'adat would have been the head of
16:17:09 4 the PFLP?

16:17:14 5 A. After the Ze'evi operation?

16:17:16 6 Q. Yes, after Mustafa was killed.

16:17:26 7 A. That's -- has mean that he -- Ahmed Sa'adat
16:17:31 8 is the general secretary following Abu Ali. This is
16:17:35 9 well known for everybody.

16:17:37 10 Q. Yes. Ahmed Sa'adat has been the leader of
16:17:40 11 the PFLP since Mustafa was killed until today; correct?

16:17:54 12 A. So far. Now, of course, he is incarcerated.
16:18:01 13 I don't know if he is running the PFLP from the prison.

16:18:06 14 Q. Do you know if there is another leader of the
16:18:08 15 PFLP, or if Ahmed Sa'adat is the leader of the PFLP?

16:18:18 16 A. At the time -- I know that Ahmed Sa'adat was
16:18:22 17 the general secretary at the time.

16:18:26 18 Q. All right. You testified earlier, I
16:18:28 19 believe -- and correct me if I'm wrong -- that the
16:18:38 20 PA monitors funds that go to Hamas?

16:18:53 21 A. Not just Hamas. Any party, even if it's a
16:19:03 22 non-political party, it monitors.

16:19:06 23 Q. I'm asking, though, just about Hamas -- sorry.

16:19:11 24 I'm asking you just about Hamas. The PA
16:19:11 25 monitors funds that go to Hamas?

16:19:15 1 A. Correct.

16:19:16 2 Q. The PA monitors funds that go to Islamic
16:19:19 3 Jihad?

16:19:20 4 A. Yes.

16:19:26 5 Q. The PA does not monitor funds that go to the
16:19:30 6 PFLP?

16:19:40 7 A. The PA monitors all transfers, regardless of
16:19:44 8 which party. Every transfer is being monitored. Any
16:19:52 9 amount which exceeds \$1,000 entering Palestine should
16:20:01 10 report about the source and the beneficiary.

16:20:07 11 Q. When you say "entering Palestine," does that
16:20:11 12 mean if the bank is located in Palestine?

16:20:17 13 A. The bank in Palestine.

16:20:19 14 Q. Well, what about if a group like Hamas,
16:20:23 15 for example, is receiving funds in a bank outside
16:20:27 16 of Palestine?

16:20:34 17 A. Where does it receive these funds?

16:20:37 18 Q. A bank in another country.

16:20:43 19 A. You ask the other country what they do
16:20:45 20 with it.

16:20:46 21 Q. So you only have the ability to monitor
16:20:50 22 funding to Hamas that goes to a bank in -- located
16:21:00 23 within Palestine? And does that mean the branch that
16:21:10 24 it goes into has to be located in Palestine?

16:21:16 25 A. (In English.) Okay.

16:21:18 1 Q. I'm asking.

16:21:25 2 A. I want to answer. Can I -- am I in a
16:21:30 3 position, for example, to monitor the bank transfers,
16:21:34 4 say, in Kuwait?

16:21:37 5 Q. What's the name of a bank that operates in
16:21:39 6 Palestine, that has a branch located in Palestine?

16:21:49 7 A. There are many banks.

16:21:51 8 Q. Give me the name of one, please.

16:21:54 9 A. The Arab Bank.

16:21:55 10 Q. Okay.

16:21:56 11 A. (In English.) Bank Palestine, Bank
16:22:01 12 Cairo-Amman, Bank Jordan.

16:22:02 13 (Comment in Arabic by the witness.)

16:22:06 14 CHECK INTERPRETER HAZOU: "HSBC."

16:22:15 15 THE WITNESS: (In English.) HSBC.

16:22:15 16 (Comment in Arabic by the witness.)

16:22:18 17 THE WITNESS: Lots of them, abundant.

16:22:22 18 Q. BY MR. SCHOEN: If one of those banks, HSBC,
16:22:26 19 for example, any one of those banks, receives funds
16:22:30 20 intended for Hamas, how would you monitor that those
16:22:43 21 funds are going to Hamas?

16:22:47 22 A. We have the Monetary Authority, which is in
16:22:57 23 the form of a central bank. This Authority receives
16:23:07 24 statements on a daily basis from the banks and monitors
16:23:12 25 all transfers and, in turn, informs the security

16:23:20 1 apparatus about these statements.

16:23:25 2 And we, in our turn, do the checking of --
16:23:29 3 for who receives where these monies are directed to.
16:23:34 4 The bank, as a bank, is not in a position to know
16:23:42 5 whether this is Hamas or Fatah. Their role, it is
16:23:47 6 simply to receive funds. And my job, it is to verify
16:23:51 7 the sources and the address where these funds are
16:23:57 8 coming and going to.

16:23:58 9 (Comment in Arabic by the witness.)

16:23:58 10 MR. SCHOEN: He just said something?

16:23:58 11 THE WITNESS: The party where they are
16:24:05 12 directed.

16:24:05 13 Q. BY MR. SCHOEN: How do you do that? How do
16:24:07 14 you determine the party where they were directed?

16:24:21 15 A. I do investigation, and I verify these names.
16:24:24 16 I check them.

16:24:26 17 Q. What are the steps in that investigation?

16:24:39 18 A. If it becomes clear that these funds are
16:24:43 19 directed to Hamas, I will hold it and confiscate it.

16:24:49 20 Q. How about Fatah? Do you monitor funds to
16:24:54 21 Fatah?

16:25:04 22 A. Is my job that Fatah is receiving money from
16:25:09 23 the outside?

16:25:11 24 Q. I'm asking you.

16:25:14 25 A. If that's the case, the economic situation

16:25:17 1 in Palestine would have been much better.

16:25:21 2 Q. If what, if Fatah were receiving funds from
16:25:25 3 outside?

16:25:26 4 A. So that you are in the picture, any person,
16:25:32 5 regardless, receives a money transfer, even if it was
16:25:39 6 me, they should -- you should come back to me, refer
16:25:44 7 to me about the source of this money and why it was
16:25:56 8 dispatched.

16:25:57 9 And you have lots of immigrants, migrants
16:26:00 10 of Palestinians abroad. Somebody might be living
16:26:05 11 in Kuwait and his wife is in Ramallah. So he sends
16:26:09 12 a monthly transfer. If this transfer is based on
16:26:18 13 legal considerations and with the amount that is
16:26:20 14 allowed by law, there is no security or political
16:26:27 15 reason.

16:26:31 16 Fatah is not the security organs. Most of
16:26:38 17 the detainees are from Fatah. And maybe you heard that
16:26:48 18 a few days ago a lieutenant was killed in Jenin from
16:26:54 19 the Preventive Security. And the detainees in Jericho,
16:26:59 20 most of them now who are held are from Fatah. And the
16:27:07 21 instructions we have, to act in a professional manner
16:27:09 22 and objective, in a neutral way, without any connection
16:27:17 23 to the political affiliation.

16:27:23 24 We cannot connive on any money that is given
16:27:29 25 to Fatah. Fatah is not entitled to get transfers from

16:27:39 1 abroad if it is not based on the law.

16:27:45 2 Q. You distinguish in PFLP between the political
16:27:50 3 wing and the military wing?

16:27:52 4 (Brief exchange in Arabic among Official
16:28:04 5 Interpreter Aghazarian, Official Interpreter
16:28:04 6 Ben-Naim, Check Interpreter Hazou, and the
16:28:04 7 witness.)

16:28:12 8 THE WITNESS: The military wing is illegal,
16:28:18 9 according to the law. And if I know that there is
16:28:27 10 anybody pertaining to the military wing, I have the
16:28:31 11 right to chase him legally. And this is why around
16:28:41 12 2000, 2001, a presidential decree was issued that
16:28:47 13 considers that this is a prohibited and illegal and
16:28:52 14 a suspected body.

16:29:02 15 Q. BY MR. SCHOEN: Are you aware that the PFLP
16:29:05 16 has offices in different towns?

16:29:14 17 A. I know that it has an office in Ramallah.
16:29:23 18 I don't know about the other areas.

16:29:26 19 Q. Are you aware if, during the time period of
16:29:29 20 this bombing, the PFLP had an office in Kalkiliya?

16:29:40 21 A. I answered this question that I don't know.

16:29:45 22 Q. Okay. If the PFLP had an office in Kalkiliya
16:29:50 23 and there were weapons kept in that office, do you have
16:30:03 24 a judgment as to whether that office would be a PFLP
16:30:08 25 political office or a military wing office?

16:30:11 1 MR. HIBEY: Excuse me. That's a cause but
16:30:13 2 that's --

16:30:13 3 MR. SCHOEN: Let him translate the question
16:30:15 4 first.

16:30:17 5 (Pending question translated.)

16:30:17 6 MR. HIBEY: That question has no foundation
16:30:22 7 as per -- it's hypothetical, and I object to its being
16:30:28 8 asked.

16:30:38 9 THE WITNESS: I didn't grasp the question.

16:30:40 10 Q. BY MR. SCHOEN: You distinguish between
16:30:41 11 the political wing and the military wing of the PFLP;
16:30:46 12 correct?

16:30:59 13 A. I said -- I said that the military wing is
16:31:05 14 banned. It's prohibited according to the Palestinian
16:31:10 15 law. And this applies to the PFLP and the rest of the
16:31:20 16 Palestinian factions, including Fatah itself.

16:31:22 17 Q. What's the difference between the military
16:31:25 18 wing of the PFLP and the political wing of the PFLP?

16:31:32 19 A. What's the difference between the political
16:31:34 20 and the military? For me, as a security man, that this
16:31:47 21 faction or this group perpetrates acts that are against
16:31:52 22 the law and the other stick to the law.

16:31:57 23 Q. Would it be against the law in Kalkiliya,
16:32:00 24 in the year 2000 and 2001, for the PFLP to have weapons
16:32:15 25 in an office of the PFLP in Kalkiliya?

16:32:26 1 A. I don't know.

16:32:27 2 Q. You don't know? You testified earlier that
16:32:35 3 your job, among other things --

16:32:42 4 A. I don't know at the time if there was an
16:32:44 5 office.

16:32:45 6 Q. I didn't ask you if there was an office.

16:32:52 7 A. You're telling me that there was an office
16:32:55 8 in Kalkiliya where there were weapons there.

16:33:00 9 Q. I'm asking you: If there were an office in
16:33:02 10 Kalkiliya, a PFLP office, and there were weapons kept
16:33:09 11 there, would that be illegal?

16:33:15 12 A. For sure.

16:33:19 13 Q. Who is Raed Nazzal?

16:33:24 14 A. Raed Nazzal? This name sounds familiar.
16:33:44 15 I think he was murdered.

16:33:46 16 Q. What else do you know about Raed Nazzal?
16:33:48 17 Anything else?

16:33:56 18 A. I know that he was a resident of Kalkiliya.
16:33:59 19 He was murdered by the Israeli army. And I know at
16:34:12 20 the time he was a military, but a military that is
16:34:18 21 unemployed and part of the people that were recruited
16:34:24 22 to the security organs that would be rehabilitated.
16:34:35 23 This is what I recall concerning Raed Nazzal.

16:34:40 24 Q. What do you mean "he was a military"?

16:34:51 25 A. That he was on the PA payroll.

16:34:55 1 Q. I see. Did he have a rank? Do you know?

16:35:06 2 A. He was military. And, of course, every
16:35:09 3 military has a rank.

16:35:10 4 Q. What was his rank? Do you know?

16:35:13 5 A. He did not dress up in military uniform.

16:35:17 6 Q. You don't know his rank?

16:35:23 7 A. But every military must have a rank.

16:35:32 8 Q. What agency did he work for?

16:35:39 9 A. I heard -- I haven't seen with my own eyes --
16:35:43 10 that, when he was murdered, he was not on the PSS, but
16:35:53 11 he was on the payroll of one of the agencies, either
16:35:57 12 police or national security.

16:35:59 13 Q. You mean one of the PA agencies that we spoke
16:36:03 14 about?

16:36:08 15 A. For sure, yes.

16:36:13 16 MR. SCHOEN: I didn't hear the answer.
16:36:14 17 Someone was --

16:36:20 18 OFFICIAL INTERPRETER AGHAZARIAN: "For sure,
16:36:22 19 yes."

16:36:23 20 MR. SCHOEN: Okay. If we could take a break
16:36:28 21 here for five minutes, I may be just about finished.
16:36:32 22 I will be able to determine that in five minutes.

16:36:33 23 MR. HIBEY: I'll -- take a break.

16:36:37 24 THE VIDEOGRAPHER: Going off the record at
16:36:38 25 4:37.

16:36:43 1 (Recess from 4:37 p.m. to 4:47 p.m.)

16:45:40 2 THE VIDEOGRAPHER: Back on the record at 4:47.

16:45:45 3 Q. BY MR. SCHOEN: Mr. Raed, I just want to ask

16:45:49 4 you about a few names to see if you recognize these

16:45:53 5 names.

16:45:59 6 Muhammad Zaid?

16:46:07 7 A. I don't recall. Family of -- as a family,

16:46:12 8 they might be there in Kalkiliya. But not Muhammad,

16:46:17 9 doesn't ring a bell.

16:46:18 10 Q. Muhammad Mahmoud Zaid? Doesn't -- you don't

16:46:23 11 know that name?

16:46:24 12 A. No.

16:46:24 13 Q. Fa'ar Adnan Sa'id Daoud?

16:46:26 14 A. The family of Daoud are certainly from

16:46:43 15 Kalkiliya. But not this particular, I don't know him.

16:46:50 16 Q. Do you know Muhammad Nazzal?

16:46:56 17 A. Also from Kalkiliya, but not this

16:46:59 18 particular -- now, I mean, my memory is not helping me.

16:47:07 19 Q. Ahmed Al-Rai?

16:47:09 20 A. This name certainly passed. However, as a

16:47:22 21 name, you know, it rings a bell, but I don't remember

16:47:25 22 the details. The name is there. He could be one of

16:47:33 23 the people that were murdered. Possible.

16:47:38 24 Q. Of the people I've named so far, do you know

16:47:41 25 whether any of them are PFLP members?

16:47:50 1 A. I don't recall them in the first place.

16:47:55 2 Q. Maher Al-Rai?

16:48:00 3 A. You're speaking a memory that, in ten years,

16:48:09 4 it has sank. In Arabic, my memory covers five years.

16:48:17 5 After that, I delete.

16:48:20 6 Q. Taysir Quba'a?

16:48:23 7 MR. SCHOEN: You pronounce it. I've

16:48:25 8 mispronounced it every time I've done it.

16:48:26 9 OFFICIAL INTERPRETER BEN-NAIM: I'm still

16:48:26 10 trying to --

16:48:26 11 MR. SCHOEN: Quba'a. Taysir Quba'a.

16:48:27 12 THE WITNESS: (Not translated.) Taysir

16:48:27 13 Quba'a? Taysir Quba'a?

16:48:32 14 (Translated.) A well-known name, but I don't

16:48:41 15 recall perfectly.

16:48:42 16 Q. BY MR. SCHOEN: Someone involved with the PA

16:48:51 17 or the PNC?

16:49:02 18 A. It's possible. The name is there, but I don't

16:49:04 19 know how -- where to place it.

16:49:09 20 Also, what's the time?

16:49:12 21 Q. What about Intissar Al-Wazir.

16:49:18 22 A. For sure, I know her.

16:49:19 23 Q. Who is she?

16:49:19 24 A. The spouse of Abu Jihad, Khalil Al-Wazir.

16:49:26 25 Q. Who is Abu Jihad?

16:49:29 1 A. He was working with the PLO, and he was
16:49:35 2 murdered in Tunis.

16:49:37 3 Q. Does he have another name?

16:49:42 4 A. He is known as Abu Jihad.

16:49:46 5 Q. And does -- if you know, does Intissar
16:49:48 6 Al-Wazir --

16:49:51 7 MR. HIBEY: I thought you just asked that.

16:49:57 8 MR. SCHOEN: Now I'm going to ask something
16:49:59 9 about her.

16:50:00 10 MR. HIBEY: Oh, sorry.

16:50:00 11 (Brief exchange in Arabic among Official
16:50:00 12 Interpreter Ben-Naim, Check Interpreter Hazou,
16:50:00 13 and the witness.)

16:50:09 14 Q. BY MR. SCHOEN: Are you aware that
16:50:10 15 Ms. Al-Wazir is the president of an organization
16:50:19 16 called Foundation Care Families of Martyrs and Wounded?

16:50:28 17 (Pending question partially translated.)

16:50:41 18 OFFICIAL INTERPRETER BEN-NAIM: "Foundation
16:50:41 19 Care" -- sorry?

16:50:43 20 MR. SCHOEN: "Foundation Care Families of
16:50:47 21 Martyrs and Wounded."

16:50:49 22 (Remainder of pending question translated.)

16:50:51 23 THE WITNESS: We do have such a foundation
16:50:54 24 in the PA.

16:50:55 25 Q. BY MR. SCHOEN: Are you aware of Ms. Al-Wazir

16:50:56 1 being the president of that organization?

16:51:13 2 A. Currently?

16:51:15 3 Q. Yes.

16:51:21 4 (Court reporter clarification.)

16:51:21 5 THE WITNESS: Currently, I don't know.

16:51:22 6 Because, thanks God, I don't have no martyr and no
16:51:31 7 wounded.

16:51:32 8 Q. BY MR. SCHOEN: Are you aware of her being
16:51:34 9 the president at any time of that organization?

16:51:39 10 A. I know that she used to be a minister at
16:51:42 11 a given time.

16:51:45 12 Q. If the PA -- you in law enforcement or the
16:51:49 13 PA otherwise learned that there was illegal activity
16:52:08 14 going on in an office within your jurisdiction, meaning
16:52:17 15 in Palestine, would the PA have the power to close that
16:52:29 16 office?

16:52:33 17 A. Of course.

16:52:35 18 Q. All right. And I think the last area: Are
16:52:40 19 you aware that Hamas, for example, makes payment to
16:52:49 20 the families of suicide bombers?

16:53:06 21 A. Hamas pays funds?

16:53:12 22 Q. I'm asking.

16:53:14 23 A. We, as a security, confiscated lots of funds
16:53:21 24 that were -- that were given -- that was given by Hamas
16:53:26 25 to families of people who are incarcerated or to the

16:53:30 1 families of martyrs. According to the law, this is
16:53:36 2 illegitimate and prohibited. Why it is prohibited:
16:53:46 3 Hamas is not an authority. There is one authority,
16:53:48 4 and there is one law.

16:53:52 5 Q. Do you believe, as a law enforcement officer,
16:54:00 6 that by making those payments, Hamas undercuts, hurts
16:54:10 7 your work, in trying to fight against -- in trying to
16:54:17 8 fight against terrorism?

16:54:24 9 A. I prevent, confiscate, and combat such funds.
16:54:30 10 And we did confiscate lots of funds, and we continue
16:54:35 11 to do so. And during this period, we have put our
16:54:41 12 hands on millions of dollars.

16:54:45 13 Q. One or two questions more.

16:54:55 14 How is a person who is a PA policeman or PSS,
16:55:03 15 a PSS employee, an employee of one of those four law
16:55:15 16 enforcement agencies we talked about? How are they
16:55:20 17 paid by the PA? By check or by wire?

16:55:24 18 A. Through bank transfers.

16:55:36 19 Q. And are they -- does the PA have policemen
16:55:39 20 or law enforcement agents in Gaza also?

16:55:53 21 A. Currently, you mean?

16:55:58 22 Q. Yes.

16:56:00 23 A. Currently, there are no PA security
16:56:03 24 organs in Gaza. Now it is Hamas that undertakes
16:56:13 25 the responsibility of security in the Gaza strip.

16:56:17 1 But, currently, the PA pays the salaries
16:56:26 2 of those functionaries who were working previously
16:56:31 3 with the PA, and this is a legal obligation. They
16:56:39 4 are sitting at home, but they still get their salaries.
16:56:44 5 That's the only possibility. There are humanitarian
16:56:51 6 angles in the issue, and these people must receive
16:56:55 7 allowances in order to be able to live.

16:56:58 8 Q. So if you know, who pays the civil servants'
16:57:04 9 salaries, operating in Gaza?

16:57:17 10 A. Do you mean the functionaries or the public --
16:57:21 11 the civil service of Hamas or the PA?

16:57:24 12 Q. First the civil service of the PA operating
16:57:29 13 in Gaza.

16:57:35 14 A. The civil servants who were in Gaza, who were
16:57:39 15 working with the PA before the "putsch," we still pay
16:57:47 16 their salaries. Whereas -- whereas, those who came
16:57:55 17 after Hamas, it is Hamas that covers their salaries.

16:58:00 18 Q. I see. Are there any civil servants today
16:58:03 19 working -- actually working still in Gaza, who are on
16:58:07 20 the PA payroll?

16:58:15 21 A. While they are sitting home, they still get
16:58:25 22 their salary. Because Hamas will not agree -- because
16:58:31 23 Hamas will not agree to hire them or provide their
16:58:35 24 salaries.

16:58:36 25 Q. Okay. And what is the source of the --

16:58:39 1 what bank pays the salaries of the PA law enforcement
16:58:45 2 officers?

16:58:56 3 A. Where?

16:58:57 4 Q. Now. I mean, your salary, for example.

16:59:01 5 A. For instance, my -- my account is transferred
16:59:05 6 to the Bank of Palestine.

16:59:07 7 MR. SCHOEN: From -- you mean "from"? He
16:59:09 8 gets paid from the Bank of Palestine?

16:59:14 9 THE WITNESS: Through the bank, that's
16:59:15 10 correct. The choice of the bank depends on the given
16:59:21 11 individual. If I don't like the Bank of Palestine,
16:59:26 12 I could open an account in any other bank. I am --
16:59:32 13 my account is in Bank Palestine, and my wife's is
16:59:39 14 in Rafah Bank.

16:59:42 15 MR. SCHOEN: I was really asking about what
16:59:45 16 bank it's paid from, and not what account -- where the
16:59:47 17 account is of the recipient.

16:59:50 18 (Pending question partially translated.)

16:59:52 19 OFFICIAL INTERPRETER BEN-NAIM: "And not"?

16:59:54 20 MR. SCHOEN: Not the account of the recipient.

16:59:56 21 (Remainder of pending question translated.)

16:59:58 22 THE WITNESS: I have no idea of this.

17:00:09 23 MR. SCHOEN: Okay. I don't have any other
17:00:10 24 questions.

17:00:13 25 MR. HIBEY: Indulge me a moment, please.

1 I'd like to have about five minutes.

2 MR. SCHOEN: Sure.

3 THE VIDEOGRAPHER: Going off the record
4 at 5:01.

5 (Recess from 5:01 p.m. to 5:07 p.m.)

6 THE VIDEOGRAPHER: On the record at 5:07.

7 MR. HIBEY: We have no questions of the
8 witness. Thank you.

9 MR. SCHOEN: Thank you. And thank you,
10 Mr. Raed.

11 THE VIDEOGRAPHER: That concludes the video
12 deposition at 5:07.

13 (The deposition concluded at 5:07 p.m.)
14
15
16
17
18
19
20
21
22
23
24
25

1 CERTIFICATE OF WITNESS/DEPONENT

2
3 I, RAED TAHA MAHMUD AMAYRA, witness herein,
4 do hereby certify and declare the within and foregoing
5 transcription to be my examination under oath in said
6 action taken on September 10, 2012, with the exception
7 of the changes listed on the errata sheet, if any;

8 That I have read, corrected, and do hereby
9 affix my signature under penalty of perjury to said
10 examination under oath.

11
12
13
14
15 _____
16 RAED TAHA MAHMUD AMAYRA, Witness

_____ Date

CERTIFICATE OF REPORTER

I, AMY R. KATZ, RPR, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was duly affirmed by me to testify to the truth, the whole truth, and nothing but the truth;

That the foregoing deposition was taken before me at the time and place herein set forth, at which time the aforesaid proceedings were stenographically recorded by me and thereafter transcribed by me;

That the foregoing transcript, as typed, is a true record of the said proceedings;

And I further certify that I am not interested in the action.

Dated this 30th day of September, 2012.

AMY R. KATZ, RPR

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET

*** SHABTAI SCOTT SHATSKY, et al., v.

THE SYRIAN ARAB REPUBLIC, et al. ***

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

Page _____ Line _____ Change _____

Reason _____

RAED TAHA MAHMUD AMAYRA, Witness

Date

<p>A</p> <p>Abdel 36:3</p> <p>ability 74:21</p> <p>able 8:7,12 47:6,21 68:23 81:22 87:7</p> <p>abort 47:6 53:14</p> <p>aborted 47:20</p> <p>above-entitled 2:2</p> <p>abroad 77:10 78:1</p> <p>absorb 37:22</p> <p>Abu 12:10 24:11 61:12 72:22 73:8 83:24,25 84:4</p> <p>abundant 75:17</p> <p>acceptable 13:13</p> <p>access 54:23 55:8 56:13</p> <p>accords 37:13,15 48:14,15 71:6</p> <p>account 88:5,12,13 88:16,17,20</p> <p>accumulated 39:3</p> <p>accurate 37:25</p> <p>accused 45:12 46:11 52:15</p> <p>acquired 17:24</p> <p>act 70:18,24 71:15 77:21</p> <p>acted 53:16</p> <p>acting 38:16</p> <p>action 1:6 25:17 47:21 49:17,19 50:2,10 53:10,14 53:19 90:6 91:15</p> <p>actions 46:12 50:12 58:12 71:22 72:19</p> <p>activities 33:24</p> <p>activity 69:8 85:13</p> <p>acts 50:4 79:21</p> <p>addition 39:6 71:24</p> <p>address 8:3,25 67:25 76:7</p> <p>addressed 6:23,24 68:22</p> <p>administrative 32:2,22,22,23</p> <p>Adnan 82:13</p>	<p>adopted 34:5</p> <p>advance 9:7</p> <p>advisor 13:3 19:21 19:24 20:1</p> <p>advisors 45:21</p> <p>Advocate 3:7,8,9</p> <p>affair 72:14</p> <p>affairs 19:1</p> <p>affiliation 23:10 77:23</p> <p>affirmed 6:5,10 91:5</p> <p>affix 90:9</p> <p>aflame 59:4</p> <p>aforesaid 91:10</p> <p>agencies 37:21 40:20 41:6,21,22 72:11 81:11,13 86:16</p> <p>agency 20:19 21:13 39:14,24 39:25 40:4 81:8</p> <p>agents 86:20</p> <p>Aghazarian 3:5 6:1 19:5 21:6 28:8 31:2 32:8 33:12,21 40:12 41:20 54:10 56:4 65:14,16 70:15 78:5 81:18</p> <p>ago 11:14 12:12 47:17 77:18</p> <p>agree 43:8,14 48:8 51:1 69:7 87:22 87:23</p> <p>agreed 41:24</p> <p>agreement 38:17 41:25 71:7</p> <p>ahead 54:6</p> <p>Ahmed 72:23 73:3 73:7,10,15,16 82:19</p> <p>air 63:17</p> <p>airplanes 65:2</p> <p>al 1:4,7 92:2,3</p> <p>Alabama 2:14</p> <p>ALBERT 3:5 6:1</p> <p>Ali 72:22 73:8</p> <p>allow 9:12</p>	<p>allowances 87:7</p> <p>allowed 77:14</p> <p>Al-Aqra'a 18:12 62:8</p> <p>Al-Qilt 34:2</p> <p>Al-Quds 12:8,19</p> <p>Al-Rai 82:19 83:2</p> <p>Al-Rih 20:17</p> <p>Al-Sheikh 61:22 62:10</p> <p>Al-Wazir 83:21,24 84:6,15,25</p> <p>Amayra 1:14 2:2 4:3 5:8 6:8 10:4 90:3,15 92:24</p> <p>amended 6:17,22 7:5</p> <p>America 69:21,21</p> <p>American 2:5 11:3 43:4 47:16</p> <p>amount 74:9 77:13</p> <p>amounts 68:11</p> <p>ample 24:24</p> <p>Amy 1:25 2:4 5:12 91:3,20</p> <p>and/or 7:8 27:19</p> <p>angle 46:22</p> <p>angles 87:6</p> <p>annulled 38:25</p> <p>answer 8:22 14:15 14:21 15:6,8,15 16:1 17:2 43:23 44:12,14,20,21 44:23,24,25 53:8 55:3 56:11 70:20 75:2 81:16</p> <p>answered 62:3 70:11,18 78:21</p> <p>answering 41:14</p> <p>anybody 27:10 38:5,15 52:3 59:23 78:10</p> <p>anyplace 12:23,25 57:2</p> <p>apart 47:11</p> <p>apartment 10:11 10:12,15</p> <p>apparatus 13:7 20:11,24 21:1,4</p>	<p>37:18 39:16 40:5 40:24 41:2 47:25 65:12,17 76:1</p> <p>appearance 5:14</p> <p>APPEARANCES 2:10 3:1</p> <p>application 71:20</p> <p>applied 71:18</p> <p>applies 72:3 79:15</p> <p>applying 39:9</p> <p>appreciate 9:6,11</p> <p>appropriate 9:20 9:20</p> <p>Aqra'a 61:11</p> <p>Arab 1:7 5:9 24:23 68:5 75:9 92:3</p> <p>Arabic 3:4,5,6 5:4 6:4,6,6 28:7 31:1 33:20 40:11 42:9 44:8 65:13 70:14 75:13,16 76:9 78:4 83:4 84:11</p> <p>Arafat 38:13</p> <p>archive 59:4</p> <p>area 6:18 9:16 19:21 51:15 54:5 85:18</p> <p>areas 51:15 54:16 59:12 63:16 78:18</p> <p>armed 17:20 23:9 23:11 43:11,17 43:20 50:17 53:9</p> <p>arms 26:8 43:11 52:3</p> <p>army 27:23 29:5 38:10 42:19 46:19,24 54:2 57:7 60:4 63:17 64:3 80:19</p> <p>Arouri 47:15</p> <p>arrested 29:2,6 54:14</p> <p>arrests 54:16</p> <p>ashes 57:12 59:2 65:3</p> <p>Ashkelon 34:10</p> <p>asked 8:1,6 15:21 18:7 29:18,20,23</p>	<p>29:25 32:25 70:11 79:8 84:7</p> <p>asking 14:22 15:11 15:20 16:18 17:12 28:19 32:10 43:24 49:5 56:17 57:5 66:15 70:8 73:23,24 75:1 76:24 80:9 85:22 88:15</p> <p>associated 11:24 17:3</p> <p>assume 16:20</p> <p>assumed 37:16 39:8 45:22</p> <p>assumption 45:14</p> <p>assure 54:3</p> <p>attacked 64:18</p> <p>authorities 51:17</p> <p>authority 37:23 45:22 75:22,23 86:3,3</p> <p>Avi 3:8 5:16</p> <p>Aviv 11:8</p> <p>avoid 17:6</p> <p>aware 25:10 30:18 33:16 34:19 42:1 42:5 57:6 60:16 60:22 65:20 69:23 70:1,5,8,22 70:25 78:15,19 84:14,25 85:8,19</p> <hr/> <p>B</p> <p>B 4:10</p> <p>BA 12:16,18</p> <p>back 27:2,11 36:15 50:22 54:23 77:6 82:2</p> <p>bank 13:4,5 19:25 20:2 39:11 51:10 52:22 54:24 58:6 64:22 74:12,13 74:15,18,22 75:3 75:5,9,11,11,12 75:23 76:4,4 86:18 88:1,6,8,9 88:10,11,12,13 88:14,16</p>
--	--	---	--	--

banking 67:10,11	better 31:20 39:3,7	C	change 13:19 92:5	12:5 17:5 21:18
banks 68:6 75:7,18	39:12 77:1	C 4:15 5:1	92:7,9,11,13,15	85:4
75:19,24	beyond 9:9	Cairo-Amman	92:17,19,21	clarify 7:18,19 8:5
banned 79:14	binding 72:6	75:12	changes 90:7	43:12 44:17
Barak 47:23	Bitunya 64:21	call 10:17,20 21:12	chaotic 57:18	clarity 8:12
Barghouti 25:19	black 31:21	31:23,25 43:11	charge 28:12	clear 8:19 13:22
barging 63:17	blew 11:17	called 6:9 20:16	30:17 32:13,20	14:22 15:11 17:6
based 50:24 52:21	bodies 65:21	47:15 84:16	33:2 52:15 62:14	34:24 41:13 57:5
70:6,18 77:12	body 72:16 78:14	calls 30:6 43:16	charged 30:23	76:18
78:1	bomber 11:20	49:9 56:21 58:16	charges 32:5	Clearer 34:25
basic 45:7	35:21	58:23	CHARTERED	clearly 24:16
basically 48:25	bombers 85:20	capable 46:15	2:18	close 85:15
basis 22:13 70:24	bombing 11:16	capacity 17:21	chase 17:20 21:24	closed 54:21,24
75:24	34:12,13 35:6,12	Care 84:16,19,20	22:14 26:9,10	closure 56:12
battle 26:21	37:6,9 51:6,7	carried 48:24 50:9	51:25 52:2 72:11	code 71:18
becoming 17:3	52:11 53:2,5,7,20	53:15	78:11	colleagues 18:6
Beer 30:1,10	53:21 54:20	carries 50:2 52:3	chased 22:7 60:2	Colony 2:5 5:10
beginning 28:16	55:14,24 56:15	carry 35:19	72:3	Columbia 1:2 2:4
behalf 17:3 51:23	56:16 57:15,19	carrying 22:22	chasing 14:10	combat 17:20
belief 27:25	57:25 58:4,9	53:24 54:17	check 3:6 19:4	21:24 38:5 42:22
believe 9:8 11:21	61:7 62:2 64:16	case 7:3 11:7 18:1	20:25 21:3,7,14	43:7 47:13 86:9
16:14 17:7 18:16	66:5 78:20	23:1,18 34:1,2,4	23:7 28:8 31:2	combated 22:7,11
21:23 24:12	bore 47:1	35:12,22 47:14	32:6 33:21 40:13	22:24 23:11
25:21 34:9,22	branch 62:9 74:23	60:11,23 63:25	42:10 55:15,19	combating 43:4
35:5,8 42:17	75:6	76:25	56:2 64:11 65:11	48:18
43:20 46:25 47:4	branches 38:7	categories 6:16,22	65:15 69:14	come 54:23 77:6
47:9,12 57:21	break 36:9 81:20	7:4,20,22,23 8:7	75:14 76:16 78:6	comes 9:19 13:8
72:12,21 73:19	81:23	8:17 9:9	84:12 86:17	coming 29:10 76:8
86:5	breaking 57:17	category 6:20,23	checking 76:2	comment 41:15
believed 22:6	63:23	7:12,13,24 8:1,3	CHEVALIER	44:8 70:14 75:13
54:17	Brief 28:7 31:1	8:6,21,23,24 9:5	2:18	75:16 76:9
bell 82:9,21	33:20 40:11 42:9	cause 2:2 79:1	choice 88:10	commitments
belligerent 71:15	65:13 78:4 84:11	cells 38:12	circumstances	22:15
belonged 27:17	bring 8:12 23:13	center 23:22	9:17 17:2,9 45:5	committed 22:5
belongs 35:20	23:21 38:15	centered 19:22	55:8	27:19 47:3 72:7
Ben 30:4	bringing 46:13	central 75:23	citation 47:23	communicating
beneficiary 74:10	brings 13:21	certain 18:8 22:23	citizenship 47:16	55:10
Ben-Naim 3:4 6:3	broke 57:8 63:16	30:20,20 34:5,9	city 62:18,19	communicue
14:17 15:3,7	63:19,20	35:9 46:14 47:9	civil 1:6 7:7 87:8	34:20
18:19 21:11,15	broken 27:19	47:14 60:13,13	87:11,12,14,18	complaints 37:25
25:13 26:25 28:3	brought 30:17	60:14,24 63:15	civilian 26:23,24	complete 47:5
34:25 40:9,13	32:21 33:3 59:25	certainly 10:25	27:1,1 71:15	completed 47:5
41:11 42:10 56:5	building 46:1,3,9	13:1,25 14:4	civilians 26:16,17	completely 14:3
62:24 64:13	62:19,20	31:11 56:25	49:18 50:3	65:1
65:12,15 67:13	burned 57:11 59:1	82:14,20	claim 35:15	complied 22:14
67:16 70:12,16	59:1,14 65:3	CERTIFICATE	claimed 35:9,19	71:7
78:6 83:9 84:12	burnt 57:11	90:1 91:1	36:6 53:23	comply 37:12
84:18 88:19	bylaws 71:20	certify 90:4 91:3	claiming 34:21	complying 46:6
besieging 51:17		91:14	clarification 12:1	compound 69:11

computer 57:3 concerning 18:1 80:23 concluded 89:13 concludes 89:11 conclusion 49:9 conduct 6:19 conducted 5:3 34:3 35:14 42:13 42:21 56:20 57:1 58:13 60:17 conducting 22:24 35:15 46:11 confident 53:10 confirmation 72:18 confirming 7:16 confiscate 76:19 86:9,10 confiscated 85:23 conflating 43:19 43:19 confrontation 45:10 confronted 22:11 45:24 48:12 Congratulations 12:13 conjunction 69:17 connection 54:13 54:20 55:13 69:16 77:22 connive 77:24 connotations 68:2 consider 16:12 22:19,21,22 26:9 49:6,7,17,18,21 49:24 50:5 71:2 71:22 72:9,15 considerations 77:13 considering 70:2 considers 78:13 constitute 71:5 constructed 62:20 consult 18:11 consultants 45:21 consulted 18:6 content 14:25	context 52:25 continue 15:25 86:10 continued 3:1 12:19 51:23 continues 71:25 contradict 37:14 contrary 68:12 control 19:2 54:4 convicted 31:9 convinced 47:4 cooperation 45:21 68:4 Coopersmith 3:3 5:13 coordinate 45:15 coordination 45:17 69:22 copy 59:9 64:20,22 64:23 65:19 66:8 core 18:5 correct 16:8 24:21 25:3 33:18 40:18 42:13,25 52:9 58:1,18,18 64:18 73:11,19 74:1 79:12 88:10 corrected 90:8 counsel 5:14 7:15 7:16 countries 30:12 68:5 country 47:24 64:2 74:18,19 couple 44:4 course 38:19 51:4 66:6 73:12 81:2 85:17 courses 43:3,5,6 court 1:1 2:3 5:12 5:20 11:3,4 12:1 12:5 17:5 21:18 42:19 46:13 56:9 85:4 courtesy 9:11 courts 38:24,24,25 39:6 60:21 71:22 covers 83:4 87:17 created 28:21	crime 71:23 crimes 27:19 criticized 38:21 crumbling 47:11 current 39:2 currently 20:1 39:11 47:11,15 49:15,19 50:6 62:13,14,19 71:20 72:24 85:2 85:5 86:21,23 87:1 <hr/> D <hr/> D 4:1,15 5:1 Dahriya 29:15 33:4 daily 75:24 damage 63:23 danger 53:11 Daoud 82:13,14 date 38:23 54:23 58:2 90:15 92:24 Dated 91:18 David 2:12,12 5:8 5:15 10:20,21 30:4,4 day 2:6 18:9 91:18 days 32:2,16 33:2 46:1 77:18 DC 2:20 dead 30:13 deal 70:6 71:16 dealing 6:19 72:1 decision 72:5,6,18 declare 90:4 decree 72:15 78:12 defendant 9:10 defendants 1:8 2:17 5:19 7:2,16 17:4,10 defense 17:13 defined 44:2 definition 25:24 26:7 44:3 degree 12:11 delete 83:5 Democratic 24:23 demolished 27:21	27:23 46:1 57:16 63:22 65:1 demolition 63:12 demonstrating 31:4 demonstrations 30:20 denounced 50:8 department 39:24 40:2 depends 88:10 deposition 1:13 2:1 5:8 89:12,13 91:5,8 depositions 6:17 7:6 described 40:6 designate 9:6 designated 6:21 7:4,12,20 8:2 9:10 69:24 70:23 designee 17:10 despite 45:23,23 46:17 51:22 53:12 54:5 destroy 49:2 63:21 destroyed 60:12 63:7 64:8,10,17 destruction 57:20 details 82:22 detain 23:15 detained 22:25 23:2,4,24 27:4,5 27:7,14 29:7,11 29:12,13 30:15 32:1,12,15,18 46:10 53:25 54:12 60:24 detainees 37:19 38:2,9 40:7,10 46:10 77:17,19 detention 32:24 33:5 55:4,12 determine 76:14 81:22 diabetes 41:18 diabetic 41:12 died 35:24,25 Diet 41:9	difference 36:24 37:1 79:17,19 different 21:16 26:3,4 39:24 40:21 41:1 43:6 44:18 62:20 78:16 difficult 38:8 difficulties 45:23 45:24 53:13 directed 76:3,12 76:14,19 directly 9:11 51:5 55:12,16,16,20 56:1 Dis 12:10 disagrees 44:25 disaster 47:22 discuss 7:21 discussed 7:22 dismissed 38:25 dispatched 77:8 dissident 38:18 distance 55:7 distinguish 78:2 79:10 District 1:1,2 2:3,3 document 57:14 65:19 documents 27:22 57:10 59:5 60:14 60:20 dollars 86:12 Dolphinarium 11:19 dossier 52:18 dossiers 64:21 dress 81:5 drink 41:10 dschoen593@ao... 2:15 due 55:7 duly 6:5,9 91:5 duty 54:6 <hr/> E <hr/> E 4:1,10,15,15,16 5:1,1 earlier 21:23 26:4
--	---	---	---	---

63:13 64:15 73:18 80:2 easily 51:16 eating 41:12 economic 76:25 effort 40:6,17 Egypt 43:5 Eighteen 32:2 either 60:11 81:11 elaborately 37:4 elements 52:4,17 emanate 53:11 employed 13:2 20:4 42:7 employee 86:15,15 employees 41:5 42:6 encounters 45:20 enforce 25:1 enforcement 6:18 7:8 36:21 39:14 40:17 42:2,6 49:25 50:25 61:8 61:16 64:16 65:8 66:15 69:9 85:12 86:5,16,20 88:1 engage 33:7,17,24 42:24 engaged 18:2 22:20 25:4,11 26:21 33:17 42:7 45:6,10 69:8 engages 33:8,13 English 6:5,6 10:22 36:23 74:25 75:11,15 entered 46:8 59:12 60:4 entering 74:9,11 entire 20:2 58:14 entirety 8:24 entitled 17:7 77:25 entity 72:16 equate 44:5 equipment 60:6 65:10 equipped 38:8 errata 90:7 92:1 erupted 19:8	especially 31:25 38:1,11 39:7 68:9 ESQ 2:12,18,19 established 22:4 22:12 39:8 establishment 38:14 et 1:4,7 92:2,3 event 9:10 events 18:25 19:7 everybody 36:7 73:9 exact 58:2 exactly 15:13 21:14 38:23 43:2 61:20 72:13 examination 4:5 10:1 90:5,10 examine 7:13 examined 6:10 91:4 example 20:19 33:14 74:15 75:3 75:19 85:19 88:4 exceeds 74:9 exception 90:6 exchange 28:7 30:6 31:1 33:20 40:11 42:9 65:13 78:4 84:11 Excuse 14:13 20:18 26:1 63:8 70:12 79:1 Executive 2:5 exist 28:1 60:14 63:25 existing 72:5 experience 17:24 39:4 50:25 60:20 explained 14:11 explosion 34:6 expose 51:11 extent 15:22,23 67:10 eyes 81:9 e-mails 7:15	face 45:5 faced 45:24 facilitate 8:15 facing 53:13 faction 11:23 25:4 43:16 48:8 71:14 79:21 factions 24:8,17,18 24:22,24 25:2 27:17 37:12 43:1 43:10 46:5 66:17 71:5 72:1,4,8 79:16 facts 53:7,22 fair 48:2 fall 30:14 falling 47:11 familiar 22:17 34:12 44:18 45:4 80:14 families 84:16,20 85:20,25 86:1 family 11:22 31:21 82:7,7,14 far 12:2 24:13 73:12 82:24 fat 41:10,12 Fatah 23:12 24:20 24:23 25:4,8,11 25:21 33:7 36:8 50:9,11,14 72:3 76:5,20,21,22 77:2,16,17,20,25 77:25 79:16 fax 2:14,21 55:9 Fa'ar 82:13 February 34:13,16 35:7 51:7,8 52:11 57:25 58:1 58:5 Federal 7:6 feel 10:24 13:24 fetch 59:22 FIDA 24:24 field 18:22 24:25 45:9,15 50:15 Fifteenth 2:19 fight 42:23 48:17 48:23 49:23 86:7	86:8 fighting 51:1 file 57:2,3 58:24 58:25 64:23 65:6 66:4,9 filed 37:25 files 28:11 60:5,10 63:24 final 9:2 financial 6:21 7:22 find 46:13 56:23 57:7 finely 8:10 finish 12:11 finished 81:21 first 6:9 29:20 57:21 79:4 83:1 87:12 five 36:10 81:21,22 83:4 89:1 flames 59:1 focus 21:24 41:2 53:1 focusing 37:2,8 foil 47:21 follow 51:11 56:8 56:22 followed 56:21 62:6 following 5:3 53:8 61:23 73:8 follow-up 51:23 forces 42:20 foregoing 90:4 91:5,8,12 forget 29:16 30:11 form 69:12,12 75:23 formed 39:16 former 40:7,10 forth 6:11 91:9 Forty-three 10:6 forward 8:11 9:1 19:10,15 28:15 35:15 49:22 found 31:6 foundation 79:6 84:16,18,20,23 four 12:12 32:2,6	32:8,10,17,20 41:22 86:15 free 44:21 frequenting 30:2 Fridays 30:9 friend 24:9 30:5,7 friends 30:7 front 24:23,24 36:7 full 52:22 58:24 fully 63:22 function 22:13 47:2 functionaries 87:2 87:10 funding 66:22 68:17,18 74:22 funds 68:7,18,19 68:22,25 69:18 73:20,25 74:2,5 74:15,17 75:19 75:21 76:6,7,18 76:20 77:2 85:21 85:23 86:9,10 further 7:14 91:14 future 9:4 58:14
<hr/>				
G				
<hr/>				
G 5:1				
gangs 17:20				
gathering 52:17				
Gaza 45:11 50:8 86:20,24,25 87:9 87:13,14,19				
general 19:1 51:9 65:22 66:2 73:8 73:17				
GEORGE 3:6				
getting 51:3 69:10				
give 42:14 56:7,8 75:8				
given 11:1,4,11 22:23 24:7 32:23 38:4 46:15 53:9 54:4 59:15,18 60:9,20 77:24 85:11,24,24 88:10				
go 8:11 9:1 12:3,15				

27:11 30:9 59:22 73:20,25 74:2,5 God 85:6 goes 74:22,24 going 8:9 13:11 17:1 29:10 35:2 36:12,15 44:13 50:19,22 61:1,4 75:21 76:8 81:24 84:8 85:14 89:3 good 32:11 government 57:14 governorate 51:21 grasp 79:9 grew 12:22 group 48:4,8 74:14 79:21 groups 23:9,11 38:18 72:2 grow 12:21 guilty 31:6,7 gunships 59:3	happening 30:19 hardship 51:22 harmful 48:25 49:1 Hazou 3:6 19:4 20:25 21:3,7,14 23:7 28:9 31:3 32:6 33:22 40:13 42:10 55:15,19 56:2 64:11 65:11 65:15 69:14 75:14 78:6 84:12 head 18:12 19:20 61:11 62:8,12 73:3 headed 54:25 heading 68:8 headquarters 27:21,22 38:7 45:25 46:3 52:20 52:21,23,25 57:9 57:10 58:20 59:2 59:13 60:2,5,8,21 62:16 63:4,7,9,15 63:20 64:19,21 64:22,24,25 66:17,20 hear 14:17 33:10 70:13 81:16 heard 24:3 34:15 34:18,20 55:20 77:17 81:9 heart 62:19 Hebrew 29:18 Hebron 12:18,22 12:25 19:21 24:11 held 5:10 46:4 53:17 68:11 77:20 helicopter 59:3 help 8:13,14 57:3 helped 54:6 helpful 9:3 43:9 helping 82:18 hereinafter 6:11 Hibey 2:18 5:17,17 5:19 6:13 7:9 8:8 9:14 14:13,19	15:2,5,9,14,25 16:5,7,17,21 17:1 23:6 26:1 33:10 43:18,24 44:5,9 44:13,25 49:9 63:8 69:11 70:10 79:1,6 81:23 84:7,10 88:25 89:7 hire 87:23 hiring 40:7,10,16 hold 19:18 68:23 76:19 home 29:10 33:1 87:4,21 hope 30:7 47:4,5 Hotari 11:22 Hotel 2:5 5:10 house 10:11 59:21 59:23,25 houses 59:16,17 HSBC 75:14,15,18 human 38:1,21 humanitarian 87:5 hundred 20:5 21:22 22:1 hurts 86:6 Hussam 61:21 62:9 hypothetical 79:7	39:10 40:21 implementing 37:13 implied 9:11 important 43:14 51:2 imposed 56:12 improper 38:2 44:7 incarcerated 73:12 85:25 incident 65:7 include 26:17 includes 6:19 including 23:13 69:1 71:19 79:16 income 67:11,13 67:14 incursion 51:18 57:17 58:6 59:11 indicated 5:5 indicates 14:20 indicating 16:4 individual 25:8,10 50:12,13 88:11 individuals 25:6 Indulge 88:25 influx 69:6 inform 69:19,21 information 52:17 69:19,20 informs 75:25 initiative 38:5,6 50:13 inmate 29:20 inmates 29:17 46:4 inquire 9:9,13 inquiring 15:21 inside 46:3 59:14 62:18 instance 18:12 25:15 36:8 50:13 88:5 institution 39:11 instruct 14:14 17:1 44:12,13,19 44:22,24 instructed 15:15 instructing 14:20	43:22 instruction 15:2,5 16:1,20,22 instructions 38:4 45:9 50:16 51:24 52:23 56:7,8,23 59:22 71:24 77:21 intelligence 39:17 39:18,20,25 41:6 65:23 66:2 intend 9:5 intended 75:20 interchangeably 13:12 interested 37:8 91:14 interests 49:1 internal 41:2 68:13 69:2 Interpreter 3:4,5,6 14:17 15:3,7 18:19 19:4,5 20:25 21:3,6,7,11 21:14,15 23:7 25:13 26:25 28:3 28:8,8 31:2,2 32:6,8 33:12,21 33:21 34:25 40:9 40:12,12,13 41:11,20 42:10 42:10 54:10 55:15,19 56:2,4,5 62:24 64:11,13 65:11,12,14,14 65:15,16 67:13 67:16 69:14 70:12,14,16 75:14 78:5,5,6 81:18 83:9 84:12 84:12,18 88:19 Interpreters 5:4 6:4 interrogate 23:12 35:17 55:17,24 interrogated 24:5 24:6,12 25:18 27:4 34:2,9 42:16,19 53:25
<hr/> H <hr/> H 4:10 Hab 20:17 Hafith 36:3 Haller 3:7 5:16 20:24 21:2 Hamas 11:25 22:9 23:11 34:7 38:17 45:11 46:5 48:12 48:15,16,18 49:7 49:13,19 50:6,7 68:10,11,22 73:20,21,23,24 73:25 74:14,22 75:20,21 76:5,19 85:19,21,24 86:3 86:6,24 87:11,17 87:17,22,23 hands 46:18 86:12 happen 50:12,12 52:24 57:19 happened 11:8 18:25 30:25 34:10 45:11 53:6 56:18 57:25 58:4 58:6		<hr/> I <hr/> idea 13:21 47:9 68:23 88:22 illegal 69:6 78:8,13 80:11 85:13 illegally 22:22 illegitimate 72:17 86:2 illness 14:2 immediate 51:10 immigrants 77:9 impact 53:12 impeded 56:13 impediment 14:2 implementation 71:21 72:1,19 implemented		

54:19 59:9 interrogating 46:12 58:17 interrogation 13:5 19:19,22,25 20:2 38:11 46:9 51:10 51:22 52:24 53:18 54:3,18 55:5,12 65:22 66:7 interrogations 64:20 interruption 50:18 Intissar 83:21 84:5 investigate 53:5,21 investigating 37:5 56:11 58:17 investigation 18:3 37:2,9 51:6 52:12,13,16 54:13 56:22 57:15 58:8 59:6 62:2 63:25 65:7 65:20 66:5 76:15 76:17 investigations 19:20 investigative 36:18 36:21,22 investigator 59:8 involved 18:7 23:2 25:16,22 26:15 47:15 51:5 52:12 54:18 55:4,12,16 56:10 83:16 involvement 45:12 Iraq 12:19,24 Islam 47:15 Islamic 74:2 Israel 1:15 2:6 5:10 11:6 22:6 29:9 30:8 45:8 45:13 47:7 48:25 68:4 71:6 Israeli 22:16 27:23 29:5 37:20 38:10 39:10 42:18 45:18,18 46:19 46:24 50:4 51:17	54:2 57:7,13 59:11,19 60:4 64:3 72:23,24 80:19 Israelis 45:16 46:8 46:12 47:19 56:12 60:12 issue 58:13 68:1,12 68:13,14 69:2,4 87:6 issued 34:20 72:15 78:12 issues 6:20,21,23 8:4 14:9 18:8 39:1 item 50:16 Iyad 18:12 61:11 62:8,12 J Jenin 77:18 Jericho 19:22,23 77:19 Jerusalem 1:15 2:6 5:10 Jibril 20:8,13 Jihad 38:17 68:22 74:3 83:24,25 84:4 jihaz 21:2,3,12 job 21:24 23:12 42:22 48:3 76:6 76:22 80:3 jobs 19:17 joined 20:11 joint 45:21 Jordan 43:5 75:12 Jordanian 39:9 71:19 judge 31:24 judgment 78:24 judicial 56:24 60:22 jurisdiction 85:14 K Kalkiliya 11:21 18:13 34:4 51:15 51:18,19 54:5,21 54:22,22,25 55:1	56:13 57:8,20,23 59:6,8,9,10 60:11 61:8,12,16,18 62:9,15,17,22 63:7,10 64:4 66:1,12,13,18 78:20,22 79:23 79:25 80:8,10,18 82:8,15,17 Karnei 34:13 35:6 51:7 52:11 53:1 53:20 54:20 55:13,25 56:16 57:15 61:7 Katz 1:25 2:4 5:12 91:3,20 kept 78:23 80:10 Khalil 83:24 kill 48:1 killed 45:13 46:25 72:22,25 73:1,6 73:11 77:18 kind 11:7,9 44:17 47:18 53:14 65:7 72:18 kinds 28:1,10 knew 53:15,17 know 8:8 9:18 16:11 21:4 25:12 25:14,15,17 27:8 27:9 29:22,24 30:22 33:23 35:12,21 36:1,4 43:9,15 45:4 50:6,7 51:2 53:18 54:1,12,14 61:14 62:7 63:24 64:5 66:2,11,14 66:16,19,21 67:1 67:5,7,24 68:7,15 68:20,24 69:3,9 69:25 71:7 73:13 73:14,16 76:4 78:9,17,18,21 80:1,2,4,16,18,19 81:1,4,6 82:11,15 82:16,21,24 83:19,22 84:5 85:5,10 87:8	knowing 9:6 known 23:25 24:2 45:17 73:9 84:4 knows 46:19 Kussay 59:20 Kuwait 75:4 77:11 L late 29:14 law 2:12 6:18 7:8 9:9 12:4,7,19 22:15,23 23:8 25:1 27:19 36:21 39:14 40:16 42:2 42:6 46:6 49:25 50:25 61:8,16 64:16 65:8 66:15 68:12 69:9 70:7 70:24 71:17,19 71:23 72:2,19 77:14 78:1,9 79:15,22,22,23 85:12 86:1,4,5,15 86:20 88:1 laws 37:14 39:6,9 39:11 70:19 lawyer 15:22,22 15:23,24,24 16:2 16:10,13 31:10 31:12,16,22 44:19,20,22,23 lawyers 31:14,15 31:17 leader 72:20 73:10 73:14,15 learned 85:13 leave 59:16 leaving 59:23 left 36:11 59:23 60:4 64:1,2,3 legal 13:3 19:21,24 20:1 36:20 37:24 38:2,20 49:9 51:11,11,12 52:6 61:12 62:13,14 77:13 87:3 legally 52:7 78:11 legitimacy 48:9 legitimate 72:17	Leitner 3:8 5:16 lest 59:24 let's 27:20 36:25 level 38:4 69:22 leveled 63:16 65:1 liaison 42:18 Libdeh 61:12 Liberation 24:24 lieutenant 77:18 light 41:9,15 limitation 7:7,9 9:5 Line 4:17 92:5,7,9 92:11,13,15,17 92:19,21 list 23:21 27:13,16 listed 90:7 listen 52:14 lists 27:11 28:1,3,6 28:10,12 live 10:7,11 30:8 87:7 lived 10:9 12:23,25 lives 46:23 living 45:4 59:19 69:21 77:10 located 62:16 65:24 74:12,22 74:24 75:6 locations 63:18 lock-up 33:1 long 10:9 30:15 32:1,15 longer 63:25 look 39:1 64:19 lots 37:25 50:11 68:11 75:17 77:9 85:23 86:10 M MA 12:4,6,19 Maher 83:2 Mahmoud 82:10 Mahmud 1:14 2:1 4:3 5:8 6:8 10:4 90:3,15 92:24 main 21:24 37:10 38:3 49:2 52:20 52:24 58:20
--	--	---	--	--

<p>64:19 making 41:15 86:6 man 17:18 36:4 79:20 Manasra 20:16 mandate 39:1 66:7 manner 53:8 77:21 marched 46:8 marches 30:20 31:5 martyr 85:6 martyrs 84:16,21 86:1 Marwan 25:16,19 matter 5:9 6:16 8:25 17:22 35:17 56:21 67:1 69:3 matters 6:19 18:17 61:23 62:6 mean 8:6,14 11:3 12:16 13:14 22:2 26:14 30:22 31:14 36:20 49:11 50:10 56:1 57:6 59:7 63:11 65:17,18 66:22 66:23 73:7 74:12 74:23 80:24 81:13 82:18 86:21 87:10 88:4 88:7 meaning 52:5 85:14 means 24:2 30:24 31:8 meant 9:14 13:22 15:13 32:11 measures 56:25 mechanisms 43:6 medication 14:1 member 25:21 27:4 35:22 36:4 36:8 members 24:5 25:8,11 27:6 33:6,16,24 42:1,3 42:5,12,24 43:1 48:10,11,22 53:25 54:14,16</p>	<p>69:8 82:25 memory 17:24 28:11 82:18 83:3 83:4 mentioned 7:9 55:6,15,16 56:11 merge 41:3 met 29:14 Michelle 29:9 migrants 77:9 military 26:18,19 26:20,22 39:10 40:5 50:3,10 71:21 72:15,21 78:3,8,10,25 79:11,13,17,20 80:20,20,24 81:2 81:3,5,7 MILLER 2:18 millions 86:12 minds 9:21 Mine 15:10 minister 34:1 85:10 minor 30:21 minutes 36:10 81:21,22 89:1 mispronounced 83:8 missiles 47:18 mission 43:10,17 48:9 misstate 45:1,2 Mister 10:18 16:4 misunderstanding 13:24 17:7 misuse 43:21 Mitchell 3:3 5:13 moment 22:12 58:12 88:25 Monday 2:6 Monetary 75:22 money 51:3 67:23 68:3 69:6,10 76:22 77:5,7,24 monies 76:3 monitor 68:7,18 68:19 69:5 74:5 74:21 75:3,20</p>	<p>76:20 monitored 74:8 monitoring 55:6 68:3 69:18 monitors 73:20,22 73:25 74:2,7 75:24 Montgomery 2:14 month 58:11 monthly 77:12 months 12:12 30:16,24 31:8 32:3,7,9,17,20 58:11 Mordechai 3:7 5:16 move 51:21 moved 19:24 movement 11:25 22:11 moving 53:14 Muhammad 82:6 82:8,10,16 murdered 80:15 80:19 81:10 82:23 84:2 murdering 26:16 Mustafa 72:22,25 73:6,11</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N 4:1,15,15,16,16 5:1 Nablus 46:24 name 10:3,4 20:19 20:21 21:16 24:10,10 29:9 31:16,23,25 36:2 40:2 61:21 63:5 65:5 75:5,8 80:14 82:11,20 82:21,22 83:14 83:18 84:3 named 82:24 91:5 names 23:16 24:6 25:23 27:7,9,12 27:18 28:12 42:14,21 54:15 61:10 76:15 82:4</p>	<p>82:5 nascent 37:23 national 39:18 40:4 41:6 42:17 81:12 Nations 68:5 nature 17:19 28:1 28:4 50:3,10 69:13,15 Nazzal 80:13,14 80:16,23 82:16 need 10:24 26:1 needed 41:3 negative 53:12 Negev 32:3 33:1 neighbor 24:10,11 Neither 54:21 neutral 77:22 never 29:16 30:11 nonexistent 19:4,6 non-lawyer 16:24 non-political 73:22 non-security 69:4 normal 38:25 note 7:14 notes 58:22 59:10 notice 2:4 6:17,22 7:2,5,11,25 8:20 number 9:15 22:25 33:4 43:3 NW 2:19</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O 4:15,16,16 5:1 oath 90:5,10 object 9:20 43:18 43:21 44:19,20 49:10 69:12 79:7 objection 16:20,21 17:14 26:2 44:15 69:12 objective 38:3 49:2 77:22 objectives 71:16 obligation 87:3 obligations 46:22 occurred 17:25 51:8</p>	<p>offered 6:15 office 63:1 66:11 66:18,23 67:3 78:17,20,22,23 78:24,25,25 79:25 80:5,6,7,9 80:10 85:14,16 officer 17:23 48:4 49:25 50:25 51:20 59:19,25 66:15 69:9 86:5 officers 39:5 45:14 47:12 56:9 61:9 61:13 64:2 88:2 offices 2:12 45:25 46:16 53:5 60:14 60:19 62:22 63:14 64:3 65:5 65:6,24 78:16 official 3:4,5 5:4 6:4 14:17 15:3,7 18:19 19:5 21:6 21:11,15 25:13 26:25 28:3,7 31:1 32:8 33:12 33:20 34:25 40:9 40:11,12 41:11 41:20 42:9 48:16 52:5 54:10 56:4 56:5 62:24 64:13 65:12,13,14,16 67:13,16 70:12 70:14,16 78:4,5 81:18 83:9 84:11 84:18 88:19 oh 27:8 31:19 34:13 84:10 okay 9:22 13:12 36:23 48:10,10 48:11,16,22 49:23 55:21 56:14 65:5 74:25 75:10 78:22 81:20 87:25 88:23 old 10:5,6 29:7 59:20 once 45:19 48:18 57:22 64:19</p>
--	--	---	---	--

71:13 ones 34:3 35:8 onwards 19:11,12 19:12 45:25 open 29:1 54:24 88:12 openly 36:7 48:13 operates 75:5 operating 87:9,12 operation 11:8,9 11:10,19 23:2,18 34:5,8,10,19,23 35:7,13,16,18,19 35:23,24 36:7 53:11,15,17,24 54:1,7 56:24 58:10,12 73:5 operations 17:25 19:3 22:24 35:10 37:12 42:13,21 47:7 48:24 49:2 52:1,22 72:8,9,10 opinion 13:20 26:15 49:24 opposed 38:16 opposing 38:6 opposition 48:19 order 39:1 41:4 46:21 53:16 54:1 87:7 ordered 38:13 72:11 orders 39:10 ordinary 65:8 organ 13:4 20:22 20:24 21:1 organization 11:23 22:19 25:6 27:16 49:8,12,21 49:24 50:1,5,11 51:2 69:24 70:3 70:23 71:3,4,9,10 71:12 84:15 85:1 85:9 organizational 6:18 7:21 organizations 33:6 38:22 42:24 organs 28:22	37:16 40:21 77:16 80:22 86:24 OSAMA 3:9 Oslo 37:13,14 38:17 41:24 71:7 outcast 47:8 outcome 45:11 outlaw 26:10 outlawed 72:21 outset 48:13 outside 26:21 54:22 69:5 72:2 72:17 74:15 76:23 77:3 overstayed 36:10 owner 30:4 O'Toole 2:19 5:18 5:18 7:18 8:19 16:7,13,17	package 52:18 Page 4:5,17 92:5,7 92:9,11,13,15,17 92:19,21 paid 41:7 86:17 88:8,16 Palestine 47:17 69:6 71:19,20 72:9 74:9,11,12 74:13,16,23,24 75:6,6,11 77:1 85:15 88:6,8,11 88:13 Palestinian 21:5 24:25 37:14 47:16 50:4 59:16 66:17 70:6,19 71:17,18 79:14 79:16 Palestinians 49:1 77:10 Papa 29:9 papers 57:2 59:2 paraphrasing 15:12 parents 31:15,15 31:17 parse 8:10 part 16:14 18:2 41:23 42:22 45:14 71:11 80:21 partially 18:18 28:2 40:8 62:23 67:12 84:17 88:18 participants 30:13 Participating 31:4 particular 9:16 18:1,10 28:14 30:3 82:15,18 particularly 35:18 38:17 54:16 68:10 party 22:21 50:2,4 66:6 73:21,22 74:8 76:11,14 passed 82:20 pay 66:24 67:23	87:15 Paying 66:25 payment 67:11,15 67:22 68:25 85:19 payments 67:14 86:6 payroll 80:25 81:11 87:20 pays 10:15 13:9 66:19,23 67:3 85:21 87:1,8 88:1 PA's 6:18 peace 22:5,8,9,10 22:15 26:8 37:13 38:5,16 45:8 46:7 47:3,12 48:5,14,15,17,20 48:23 49:13,20 49:23 50:5 72:7 pejorative 8:14 penal 71:18,19 penalty 90:9 pending 2:2 18:18 18:21 28:2,5 40:8,15 44:10,11 62:23 63:3 67:12 67:18 79:5 84:17 84:22 88:18,21 people 23:2,13,21 23:25 24:3,7 27:6,13,18 28:12 35:16 37:18,21 41:4,17 42:15 46:5,11,25 50:9 51:13,25 52:2,5,7 52:9 54:7,19,22 55:13 58:16 60:24 61:13,24 62:4,5,6 70:6 80:21 82:23,24 85:25 87:6 percent 20:5 21:22 22:1 perfect 29:18 perfectly 83:15 period 20:9,9 22:23 24:7 26:19	28:15 32:16 39:2 46:15,23 47:6 51:14 53:9 54:4 59:15,18 60:1,9 61:7,17 62:17,21 64:5,7 65:9 68:24 78:19 86:11 perjury 90:9 permits 9:9 perpetrated 34:7 35:18 perpetrates 79:21 perpetrator 49:18 53:18 perpetrators 72:11 person 11:24 15:1 15:22,23 22:7 26:8,15 27:17 29:20 30:6 33:15 35:14,19 47:14 48:5 55:24 61:12 62:13 71:14 77:4 86:14 personal 56:10 personally 55:23 56:3,4,15 persons 69:20 person's 36:2 perspective 8:7 9:3 9:8 pertaining 68:11 78:10 PFLP 6:19 22:17 22:19,23 23:11 23:13,14,20,24 24:6,18,23 27:2,4 33:14,17,24 34:19,20,23 35:7 35:13,15,17,20 35:22 36:5,6 42:3 53:23,25 54:14,16 66:11 66:16,19,25 67:3 67:15,17,23 68:1 68:13,17,19,23 68:25 69:7,24 70:2,23 71:2,4,7
--	---	--	--	---

<p>71:9,11 72:4,16 72:20 73:4,11,13 73:15,15 74:6 78:2,15,20,22,24 79:11,15,18,18 79:24,25 80:10 82:25 phase 18:10 physically 65:24 picture 77:4 pictures 65:4 place 30:4 37:20 58:9 59:11 61:20 65:18 83:1,19 91:9 plaintiffs 1:5 2:11 5:16 7:5,15 planes 46:2 72:23 planning 46:11 platform 43:10,17 48:9 please 10:3 13:18 15:4 22:2 23:17 35:1 36:25 43:12 75:8 88:25 PLO 24:18,22 68:1 71:5,6,21 84:1 PNA 13:12 PNC 83:17 point 13:21 15:19 37:24 police 39:17,23 40:2,3,20,23,24 41:1,6 52:8 65:22 81:12 policeman 86:14 policemen 52:5 86:19 political 6:21 7:21 23:9 37:10,12 38:4 41:3 50:7 67:1 68:2,14 69:4 71:4,9,14,16 72:5 77:14,23 78:2,25 79:11,18 79:19 politics 68:16 pose 26:1 position 48:16</p>	<p>49:22 50:7 75:3 76:4 possibility 87:5 possible 25:7,9 28:13,18 30:10 31:11 60:19 66:4 66:8,10 82:23 83:18 postpone 58:13 power 85:15 powerful 19:2 PPS 21:7 practically 41:1 practice 40:20 premises 63:18 prepare 9:7 17:8 17:17 52:15 prepared 7:9,13 7:21 8:3 18:16 47:18 53:3 67:2 67:9,21 present 3:2 64:4 presidency 72:9 president 38:13 51:24 71:25 84:15 85:1,9 presidential 72:14 78:12 pressure 41:18 prevent 47:25 51:25 53:16 86:9 Preventative 21:7 preventing 53:9 Preventive 13:3 18:4,13 20:21 21:20 37:17,18 39:17 77:19 previously 37:19 38:11 39:12 62:3 87:2 primary 48:3 prior 91:4 prison 25:16 29:15 46:4,14,24 72:24 72:24 73:13 prisoners 46:18 privilege 14:20 privileged 14:14 14:19</p>	<p>probably 72:14 problem 13:16 procedure 7:7 37:5 44:24 procedures 36:18 36:20,21,22,25 37:9,23 38:20,23 51:12,13 56:21 65:8 proceeded 20:11 proceeding 17:4 proceedings 5:3 6:14 16:3 44:17 50:18 91:10,13 process 22:5,6,8,9 22:10,15 26:9 37:13 38:16 48:6 48:17,20,23 49:14,20,23 57:16 72:7 professional 39:2 40:24 77:21 prohibited 50:7 72:16 78:13 79:14 86:2,2 prohibits 23:8 72:19 pronounce 83:7 proper 37:24 38:20,22 properly 39:4 prosecution 56:25 60:22,23 protect 46:15,22 protecting 50:17 provide 38:19 87:23 provided 7:2,3 PS 18:13 PSS 21:5,8,10,20 22:13 37:10 39:13,20 40:22 40:25 41:7 47:2 51:23 52:5,20 57:9 58:21 61:11 62:11,11,12,15 63:18,20 64:21 65:10,17,21 66:1 81:10 86:14,15</p>	<p>public 49:22 60:4 87:10 publicly 48:22 punish 22:14 punishable 71:23 punished 72:3 punishing 54:7,11 purposes 16:3 pursuant 2:4 7:6 pursued 51:23 put 8:20 30:10 33:1,5 86:11 puts 49:21 putsch 87:15 putting 7:25 44:14 p.m 2:7 36:14,14 50:21,21 61:3,3 82:1,1 89:5,5,13</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualified 39:5 Quba'a 83:6,11,11 83:13,13 question 9:19 14:14,19 15:4,6 15:10 16:1 17:12 17:15,21 18:18 18:21 26:3,13 28:2,5 32:11 33:25 35:3 40:8 40:15 41:15 43:2 43:12,25 44:10 44:11,21,25 55:22 62:3,23 63:3 67:12,18,20 67:25 69:11 70:4 70:10,21,22 71:13 78:21 79:3 79:5,6,9 84:17,22 88:18,21 questioning 8:15 13:23 questions 8:1,6,9 8:21,22 16:18 17:2 36:18 37:3 86:13 88:24 89:7 quite 61:14</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 1:25 2:4 4:15,16</p>	<p>5:1 91:3,20 Rabin 29:14 Raed 1:14 2:1 4:3 5:8 6:8 10:4,19 10:20,22 12:2 17:16 28:24 36:17 45:6 50:24 51:6 52:12 55:4 55:11,23 61:6 67:24 80:13,14 80:16,23 82:3 89:10 90:3,15 92:24 Rafah 88:14 raise 17:13,14 Rajoub 20:8 Ramallah 10:8 12:22,25 52:21 57:11 58:20 59:20 62:8,10,12 64:6,6,7,9,11,12 64:12,12,17,17 66:1,17,20 72:23 77:11 78:17 ranches 46:20 rank 81:1,3,4,6,7 rare 19:3 Ras 24:11 reach 60:17 read 90:8 ready 67:4 realization 8:16 really 15:10 37:8 41:14 88:15 realm 39:19,21 69:5 reason 32:23 34:22 35:5 49:5 55:11 77:15 92:6 92:8,10,12,14,16 92:18,20,22 recall 20:6 23:23 24:6,8 27:3,7,9 28:21 31:16 34:1 42:21 53:23 54:15 61:13 63:5 80:23 82:7 83:1 83:15 receive 45:9 74:17</p>
---	--	---	--	---

76:6 87:6 received 7:11 68:19 receives 52:23 75:19,23 76:3 77:5 receiving 74:15 76:22 77:2 Recess 36:14 50:21 61:3 82:1 89:5 recipient 88:17,20 recognize 82:4 record 7:19 17:25 36:12,15 50:19 50:22 61:1,4 65:6 81:24 82:2 89:3,6 91:13 recorded 91:10 records 64:6,7,9 64:16 67:10,11 recruited 80:21 refer 13:11 21:5 52:18 65:3 77:6 referring 52:15 reflect 67:11 regarding 7:8 69:20 regardless 23:9,12 49:17 71:14 72:7 74:7 77:5 regulations 39:9 rehabilitate 37:22 41:4 rehabilitated 80:22 rehabilitating 40:17 rejected 72:10 related 6:16 17:21 37:11 43:6 53:7 57:14 60:11 64:16 65:19 relation 55:24 68:14 release 46:6,21 relevant 53:7 56:9 65:21 66:6 69:9 religious 30:5 rely 44:22	remain 30:7 Remainder 18:21 28:5 40:15 63:3 67:18 84:22 88:21 remaining 9:15 remember 11:12 11:20,23 19:7 23:1,19 24:5,9,10 24:16 25:23 27:11 28:22 29:14 31:10,12 38:23 46:23 47:14,23 51:14 56:17,18 57:3 58:2,9,19 59:18 61:15,20,21 62:5 62:21,25 63:4 68:21 72:13,22 82:21 remembered 18:8 remembers 20:10 rent 10:13,14,15 66:23,24,25 67:3 rented 62:18 repeat 15:4,17 report 74:10 REPORTED 1:25 reporter 5:12,20 12:1,5 17:5 21:18 85:4 91:1 represent 58:3 representing 8:23 Republic 1:7 5:10 92:3 requested 56:22 requests 67:14,22 67:22 requires 42:23 60:15 research 27:24 60:15 resent 72:10 reservations 71:8 resident 66:13 80:18 residing 69:21 resistance 43:11 43:17,20 44:6	50:17 respect 7:24 28:24 53:20 56:15 59:19 68:12,21 respond 6:15 7:1 17:21 29:1 71:13 responding 26:5 responsibility 34:6 34:21 35:9,15 36:6 47:2 53:24 86:25 responsible 50:14 rest 79:15 restaurant 29:8,9 29:10 30:1,3 re-form 43:24 re-translate 56:6 rhibey@milchev... 2:21 Richard 2:18 5:17 right 13:21 20:23 32:7 49:14 58:3 67:21 73:1,18 78:11 85:18 rights 38:1,22 ring 82:9 rings 82:21 RJL 1:6 Road 2:13 rockets 47:19 50:8 role 14:9 18:10 22:10 26:10 37:10,17 38:15 51:9 52:14,17,18 52:25 55:6 68:15 69:5 76:5 room 2:5 29:16,17 rooms 38:11 round 54:6 rounded 33:4 RPG 47:18 RPR 1:25 2:5 91:3 91:20 rude 17:12 rule 7:7 45:1,2 rulings 38:20 run 60:3 running 35:3 60:7 73:13	S S 4:10,15,15,15,16 5:1 Saadi 3:9 16:9,12 16:17 Sadiq 36:3 safeguard 38:5 45:8 51:12 safeguarded 47:3 safeguards 38:20 sake 27:23 salaries 87:1,4,9 87:16,17,24 88:1 salary 13:9 87:22 88:4 sank 83:4 Saqr 24:11 sat 45:19 Saturdays 30:9 saw 59:21 60:7 saying 15:12 44:7 Sa'adat 23:25 24:3 24:3 72:23 73:3 73:7,10,15,16 Sa'id 82:13 Schoen 2:12,12 4:6 5:9,15,15 7:1 8:5 9:2,22 10:2,20 12:2,6 14:16,22 15:10,16 16:2,15 16:23 17:6,16 18:20,23 19:9 21:9,19 23:14 25:19 26:11 27:2 28:4,14 31:6 32:10,14 33:14 33:25 35:2 36:9 36:17 40:10,16 41:13,19,21 42:14 43:22 44:1 44:11,16 48:2 49:13 50:24 54:9 54:12 55:17,21 55:23 56:14 60:25 61:6 63:1 63:6,10,13 64:9 64:12,15 65:18 67:14,17,21 69:16 70:20	75:18 76:10,13 78:15 79:3,10 81:16,20 82:3 83:7,11,16 84:8 84:14,20,25 85:8 88:7,15,20,23 89:2,9 school 12:3,15,17 12:18 SCOTT 1:4 92:2 screws 68:9 search 54:3 56:22 60:16,17 second 7:5,5 44:16 secretary 73:8,17 section 62:14 security 6:20 13:4 13:7 14:9 17:18 17:18,23 18:4,13 18:17 19:10,14 19:17 20:21 21:5 21:8,21 22:21 23:3,10 26:10 28:22 34:17 35:16 37:7,11,16 37:17,19,21 38:14,19,24 39:5 39:18,18 40:4 41:2,3,6,17 42:12 42:17,20 45:7,15 45:19 47:12,20 47:24 48:4 50:15 51:20 59:12,16 60:21 61:9 64:1 64:2 65:22 68:15 69:5 71:22 72:11 75:25 77:14,16 77:19 79:20 80:22 81:12 85:23 86:23,25 see 11:11 17:13 31:19 41:10 65:3 81:1 82:4 87:18 seen 81:9 semester 12:12 sends 77:11 sense 8:15 26:20 37:11 sent 42:19 47:24
---	---	---	--	---

September 1:16 2:6 5:11 90:6 91:18 series 7:15 servants 87:8,14 87:18 service 21:6,8 87:11,12 Services 21:21 65:23 set 6:11 91:9 Seventeen 10:10 Shabak 45:20 SHABTAI 1:4 92:2 shackle 46:17 shady 72:17 shape 39:12 Shatsky 1:4 5:9 92:2 sheep 31:21 sheet 90:7 92:1 sheets 28:12 52:15 shell 47:19 shelled 46:2,24 57:11 59:3,13 60:2,7 65:2 shelling 46:2 57:17 63:12,17 Sheva 30:1,10 Shimon 3:4 6:3 13:20 55:20 Shomron 34:13 35:6 51:7 52:11 53:2,20 54:20 55:13,25 56:16 57:15 61:7 shortcut 16:15,19 shot 42:18 59:23 59:24 shouldered 47:1 sic 47:22 side 22:16 37:20 45:18 siege 51:15,16 53:13 56:12 signature 90:9 signed 71:6 significant 47:6	simply 15:11 26:13 67:4 76:6 Sir 10:3 59:11 sit 23:23 27:25 36:1 46:19 sitting 16:12 87:4 87:21 situation 57:18 76:25 situations 69:18 slightly 7:19 socially 47:7 somebody 11:17 11:21 20:16 26:20 34:7 42:16 47:15,25 50:15 60:7 61:21 77:10 son 59:20,24 sorry 21:8 32:12 33:10 34:14 39:23 42:6 64:14 64:14 70:17 73:23 84:10,19 sort 11:4 sounds 80:14 source 68:7,18 69:1,10 74:10 77:7 87:25 sources 76:7 space 38:10 speak 10:22 18:9 37:4 45:3 speaking 23:3 26:6 26:7 41:13 61:25 83:3 special 40:25 specialization 18:5 40:25 specific 53:4,5 56:20 specifically 16:25 20:20 27:3 30:23 40:22 52:10 53:1 56:17,19 spoke 16:16,24 39:13 41:22 61:24 81:13 sponsorship 43:4 spouse 83:24	stand 54:7 stands 54:1 56:23 started 19:19 28:20,22 35:16 37:20 38:25 58:12 starting 19:17 71:25 starts 43:15 state 5:14 38:14,19 38:24 71:22 stated 9:11 statement 6:13 9:12 43:17 statements 52:14 75:24 76:1 States 1:1 2:3 21:13 43:6 69:18 69:23 70:2,9,23 status 39:3 stay 59:10 stayed 59:6 stenographically 91:10 steps 17:8,16 38:3 53:4,21 56:14 76:17 stick 46:21 79:22 stipulation 71:17 stolen 60:6 stones 30:10 stood 22:25 stop 43:9,15 48:4,5 street 2:19 59:21 59:24 62:22 63:1 63:5 Stress 41:19,20 strike 49:6 55:18 55:21 67:7 strip 86:25 strongly 38:21 struggling 47:10 stuck 22:5 studied 12:18 study 42:24 43:1 subject 6:16 8:25 14:8,24 45:3 subjects 7:16 14:8 14:23,24 15:20	suffering 14:2 sufficient 17:24 sugar 41:10,12 Suicidal 11:10 suicide 11:16,20 34:12 35:6,21 37:5,9 48:24 85:20 Suite 2:13,20 supervise 13:4 51:9 56:8 supervised 58:8 supervises 52:21 supervising 19:25 20:1 52:13 55:7 supervision 51:11 supervisor 20:13 supervisors 20:7 sure 13:10 18:6 22:18 24:2,19 25:11 27:15 29:3 34:18 35:25 41:8 41:24 53:10,16 55:1 61:22 64:23 66:18 73:2 80:12 81:15,18 83:22 89:2 suspected 54:19 78:14 suspects 55:5 58:17 swear 5:21 Syrian 1:7 5:9 92:3 <hr/> T <hr/> T 4:10,15,15,15,16 4:16 Taha 1:14 2:1 4:3 5:8 6:8 10:4,17 45:6 90:3,15 92:24 take 9:19 17:17 36:9 56:15 81:20 81:23 taken 2:2 5:8 43:3 53:4,21 57:9 60:12 90:6 91:8 talk 24:13 67:2	talked 56:24 86:16 talking 58:4 targeted 47:20 targets 49:18 task 45:7 69:13 tasks 47:8 Taysir 83:6,11,12 83:13 team 16:11,14 18:2 Technical 50:18 Tel 11:8 telephone 30:6 55:9 56:20 58:16 58:22 61:25,25 62:1 tell 13:18 14:7 15:9 22:2 36:25 45:2 48:21 telling 80:7 tells 48:10,10 ten 83:3 term 21:10 terms 43:21 terror 33:24 43:7 43:19 44:3 69:8 terrorism 14:10 17:20 21:25 22:3 22:20 25:5,11,22 25:25 26:2,7,12 26:14 33:7,17,18 42:7,23,23,25 43:4,9,15 44:2,3 51:1 86:8 terrorist 25:17 26:16 47:21 49:7 49:11,19,25 50:5 50:11 51:2 69:24 70:3,23 71:2,10 71:11,16 72:10 testified 6:10 11:1 18:16 25:1 68:17 73:18 80:2 testify 7:4 8:13 14:12 15:21 17:17 18:17 53:3 67:9,22 91:6 testifying 8:17 testimony 11:2,5
--	--	---	--	--

11:11 14:3,24 17:9,10 21:23 35:11 57:13 60:10 63:6 64:15 thank 6:25 9:22 12:14 19:13 32:14 48:1 89:8 89:9,9 thanks 85:6 theirs 35:10 thing 13:14 21:16 59:15 things 8:10 9:2 16:15 56:20 80:3 think 11:19 14:13 36:9 46:18 51:18 55:19 60:19 61:21 70:10 80:15 85:18 thought 8:11 9:16 63:13 84:7 thousands 24:7 three 30:16,24 31:8 32:18 59:20 62:4 throwing 50:8 tightened 68:10 time 12:24 18:7,13 18:14 23:19,24 26:18 28:14 29:8 29:18 30:8 34:17 35:3 38:3,13 42:3 47:10 51:25 54:2,15,21,24 55:2 57:21 58:19 61:6,17 62:17,21 64:5,7,13 65:9 68:24 71:8 72:20 73:16,17 78:19 80:4,20 83:8,20 85:9,11 91:9,9 times 20:3 21:19 23:19 32:18 44:4 44:19,20 68:9 Time's 60:25 Timothy 2:19 5:18 today 10:24 11:2 13:2,11 14:1,6,12 15:21 17:9,11,17	20:3 21:20 23:23 25:25 27:25 28:1 35:11 36:1 48:13 53:3 67:2,9 68:25 73:11 87:18 told 14:23,25 15:8 15:12,20 29:15 30:8,11 63:13 70:16 topic 33:19 37:4 67:24 torture 38:2 totoole@milche... 2:22 touch 55:9 tough 38:21 town 51:17 towns 78:16 train 37:22 trained 39:5 traitors 45:13 transcribed 91:11 transcript 91:12 transcription 90:5 transfer 68:6 74:8 77:5,12,12 transferred 61:19 88:5 transfers 68:4 74:7 75:3,25 77:25 86:18 translate 6:5 14:16 15:8 29:19 79:3 translated 15:18 18:18,21 21:12 21:16 26:11,23 28:2,5 40:8,15 62:23 63:3 67:12 67:18 79:5 83:12 83:14 84:17,22 88:18,21 translation 33:11 translator 10:24 13:18 15:17 translators 5:21 trial 23:13 30:24 30:25,25 38:15 52:16,19	tribunals 38:14 51:12 tried 22:10 23:5,7 37:21 true 48:7 91:13 truth 14:7 18:9 27:24 91:6,6,7 truthfully 14:3 try 8:9 13:19 16:15 43:8 trying 42:22 43:14 53:14 83:10 86:7 86:7 Tulkarm 42:16 Tunis 84:2 tunnel 19:1,8 turn 75:25 76:2 turned 34:2,6,10 TV 60:7 twelve 46:25 two 9:2,8 30:12 46:1 47:17 51:7 58:11 61:19,20 86:13 typed 91:12	unknown 35:20 use 8:14 21:9 26:2 43:11,16 44:2,6 48:5,11,17,21,22 49:22 utilized 38:9	48:23 49:22 52:6 52:8 54:17 78:23 79:24 80:8,10 weekend 30:9 well-known 83:14 went 12:17 44:4 54:5 59:2,4,21 West 13:4,5 19:25 20:2 39:11 51:10 52:22 54:24 58:6 64:22 We'll 9:19 we're 8:23 58:4 wife 31:22,23 77:11 wife's 88:13 wilderness 46:20 wing 72:15,21 78:3 78:3,8,10,25 79:11,11,13,18 79:18 wire 86:17 witness 4:2 5:21 6:9,15,24 7:3,11 7:13,17,25 8:1,12 8:22 9:6 14:6,14 14:21,23 15:11 15:15,20 16:1,16 16:23,24 17:1,3,8 18:22 19:7 23:8 25:15 26:4,6 27:1 28:6,10 31:4 32:13 33:23 40:14 41:9,17 42:11,12 43:22 44:1,1,4,8 45:2,3 49:11 56:7 63:4 63:11 67:19 69:13,15 70:17 70:18 75:13,15 75:16,17 76:9,11 78:7,8 79:9 83:12 84:13,23 85:5 88:9,22 89:8 90:3,15 91:4 92:24 witnesses 6:23 7:19 8:2,25 9:4 9:15
		U U 4:15,15 unable 51:21 undercuts 86:6 undermine 22:10 undermining 38:22 understand 13:18 21:17 36:19 48:3 49:4 67:6,19 understanding 8:16 14:5 15:16 undertaken 54:3 undertakes 86:24 unemployed 80:21 uniform 81:5 unit 60:7 United 1:1 2:3 43:5 68:5 69:18 69:23 70:2,9,22 units 41:22 university 12:8,20 12:24	V v 1:6 92:2 various 59:12 verify 51:16 76:6 76:15 versus 5:9 victims 30:14 video 89:11 videographer 3:3 5:7,13,20 36:12 36:15 50:19,22 61:1,4 81:24 82:2 89:3,6,11 videotaped 1:13 2:1 5:7 view 37:24 71:12 violations 50:14 visited 29:17	W W 4:16 Wadi 34:2 waiter 41:14,16 want 13:20 17:14 36:17 41:9 43:8 45:1,1 53:1 75:2 82:3 wanted 15:17,19 16:18 27:2 47:19 60:3 wants 17:13 48:1 war 26:21 30:12 30:13 Washington 2:20 wasn't 15:10 30:19 32:10,11 41:14 60:5 way 26:3,4 47:7 51:10 52:22 56:10 77:22 weapons 22:22 43:11,16 44:2 48:5,11,17,19,21

WITNESS/DEP...	72:14,25 73:1,5	58:7	97 24:13
90:1	Ziad 20:17	2012 1:16 2:7 5:11	98 24:13
word 8:14 15:14	Zuheir 20:16	90:6 91:18	
24:17 26:2,11,14		202 2:21,21	
26:23 29:15	\$	25 29:16	
30:11 43:19 44:6	\$1,000 74:9	2800 2:13	
55:20	1	3	
work 17:18,19	1:02-CV-02280	3 6:16,22 7:4,20	
19:19 30:1,2	1:6	8:17	
37:7,11 39:19,20	1:13 2:7	3:02 50:20,21	
41:17 45:7,13	10 1:16 4:6 5:11	3:13 50:21,23	
47:2 53:9 62:11	6:20,23 7:12,13	3:37 61:2,3	
66:3 69:15,16,17	7:24 8:3,6,18,21	3:53 61:3,5	
81:8 86:7	8:23,24 90:6	30th 91:18	
worked 18:22 19:9	10th 2:6	30(b)(6) 6:17 7:7	
19:14 20:19	100-6 2:13	17:4	
working 21:20	11 4:18	334 2:14	
29:8 34:17 37:18	14 4:18 29:7	36106-3700 2:14	
42:2,18 46:2,9	16 35:7 58:5	395-6611 2:14	
52:9 57:10 59:3	17 17:19,23		
61:7,15 64:25	18 32:16 33:2	4	
84:1 87:2,15,19	1984 29:7 30:15	4 6:16,22 7:4,20	
87:19	1989 32:15	8:17	
world 47:24,25	1994 18:23 28:17	4:37 81:25 82:1	
wouldn't 31:23,25	68:25	4:47 82:1,2	
wounded 84:16,21	1995 19:12,15,17		
85:7	20:3,6 21:19	5	
wrong 73:19	27:20 45:7	5:01 89:4,5	
	1999 20:18	5:07 89:5,6,12,13	
X	2	591-7586 2:14	
X 4:1,10		6	
Y	2:14 36:13,14	600 45:14	
Yasser 61:12 62:9	2:27 36:14,16	626-5800 2:21	
62:13	2000 17:25 18:15	626-5801 2:21	
yeah 48:7,7	18:15,17,20,24	655 2:19	
year 11:13,14,15	18:25 19:2,10,11		
18:17 79:24	20:12 45:25	8	
years 10:6,10	72:13 78:12	84 30:2,19	
17:19,23 19:10	79:24	87 29:12 32:1 33:2	
20:18 29:7 37:3	20005-5701 2:20	88 29:12 32:1 33:2	
39:4 47:17 59:20	2001 18:1,15 51:19	89 29:13,15 32:17	
61:19 68:20 83:3	57:21 72:12		
83:4	78:12 79:24	9	
youth 33:5	2002 18:1,15 20:12	900 2:20	
Z	20:15,18 34:16	917 2:14	
Zaid 82:6,10	35:7 36:25 37:3	94 18:25 19:2	
Zelda 2:13	51:8,8,14 52:11	28:20,23	
Ze'evi 23:1 34:1	58:1,5 72:12	95 19:11	
	2004 38:24 57:21		